



GRUPO LACTOGAL



PURCHASING POLICY



PURCHASING POLICY

1 / Framework, Principles and Commitments

This Policy sets out the principles, commitments, and responsibilities that guide the purchasing activity and supplier management within Grupo Lactogal, ensuring that all goods and services are acquired ethically, transparently, and sustainably, and that they contribute to long-term value creation.

Grupo Lactogal's Purchasing activities are based on the following principles:

- Integrity and Legality — Strict compliance with the law, the Code of Ethics, and internal standards, rejecting any form of bribery, corruption, fraud, or conflict of interest, in accordance with the provisions of the specific policies (Anti-corruption and Associated Risks Policy and Conflict of Interest Policy);
- Fairness and Transparency — All suppliers are treated impartially and have access to the same information and negotiation conditions, complete registration and archiving of purchasing operations (audit trail); policies, standards, and written procedures that support decisions and audits;
- Sustainability and Responsibility — Adoption of practices aligned with the UN SDGs and ISO 20400 – Sustainable Procurement, including environmental, social, and governance (ESG) aspects;
- Respect for Human Rights and Decent Work — Compliance with ILO standards and labour legislation, ensuring safe and healthy working environments;
- Environmental Protection and Resource Efficiency — Preference for suppliers with environmental certifications and circular-economy practices;
- Responsible Sourcing and Animal Welfare — Selection of raw materials that meet traceability criteria and ethical certification, as well as responsible production practices;
- Confidentiality and Data Protection — Responsible use of supplier information, in compliance with the GDPR;
- Competitiveness and Value — Purchasing decisions based on the best balance of total cost of ownership (TCO), quality, service, and sustainable impact; evaluation and classification of suppliers according to technical, economic, and ESG criteria; periodic review and monitoring of critical suppliers, with improvement plans when necessary.

2 / Scope of Application

This Policy applies to:

- All companies within Grupo Lactogal;
- All members of the governing bodies and employees, regardless of their role, position, or contractual relationship;
- All suppliers, subcontractors, and partners who perform activities on behalf of Grupo Lactogal.



3 / Responsibilities

- Purchasing Department — Ensures the implementation of this Policy, monitors performance, and promotes the training and development of teams;
- Executive Committee — Approves and reviews the Policy and oversees its application;
- Employees — Must comply with the standards, report risks, and avoid situations that may compromise the impartiality or reputation of Grupo Lactogal.
- Requesting Departments — are responsible for planning and justifying procurement needs, in compliance with the principles and guidelines defined in this Policy, and for cooperating with the Purchasing Department in its execution.
- Suppliers, service providers and business partners — must comply with applicable ethical, social, environmental and legal principles, as set out in this Policy, in the Code of Ethics and Conduct, and in the contractual instruments agreed with Grupo Lactogal.

4 / Relationship with Suppliers

Grupo Lactogal values long-term relationships based on trust, transparency, and continuous improvement.

Suppliers must:

- fully comply with this Policy and with the Grupo Lactogal Code of Ethics and Conduct for suppliers;
- ensure safe working practices, in accordance with the Grupo Lactogal Health and Safety Policy;
- respect human and labour rights;
- report any ethical breach or non-compliance through the Whistleblowing Channel (<https://canaldenuncias.lactogal.pt>).

Failure to meet these commitments may result in corrective action plans or contractual termination.

5 / Disclosure, Training and Awareness

This Policy is communicated through internal and external communication channels deemed appropriate by Grupo Lactogal, in order to ensure awareness among all individuals and entities to whom it applies.

Grupo Lactogal promotes appropriate training, awareness and communication actions, proportional to the risks and the target audiences involved, to ensure proper understanding and implementation of this Policy.



6 / Entry into Force

This Policy comes into force on the date of its approval, without prejudice to its subsequent dissemination through the appropriate internal channels.

7 / Review

This Policy is subject to periodic review, or whenever relevant changes occur in the legal, organisational or operational framework that justify it, in accordance with the document governance system of Grupo Lactogal.