



Code: ES-SGCP-RE-V01-06032023-Supplier Code of Ethics

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VALIDATION CHECK

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1 Object

FI GROUP presents itself to its suppliers with a firm commitment to comply with the legislation in force, as well as with the Ethical Principles and rules of conduct assumed voluntarily and which have been reflected in its Code of Ethics.

Therefore, it is essential for FI GROUP that its suppliers comply with certain standards of behaviour, aligned with our Code of Ethics and our Criminal Compliance Management System under the UNE 19601 standard.

2 Scope of application

This Code of Ethics is mandatory for all FI GROUP's suppliers, regardless of their sector of activity or geographical location.

For the purposes of this Code, "Supplier" means the natural or legal person, independent of FI GROUP, who provides services or supplies products. Suppliers must expressly accept the contents of this Supplier Code of Ethics.

The Supplier of FI GROUP shall observe the following principles carrying out its activities:

3 RESPECT OF LEGALITY

3.1 Compliance with applicable laws

The Supplier shall carry out its activities in compliance with the applicable legislation, avoiding all conduct which, without infringing the applicable legislation, is contrary to this Code of Ethics.

3.2 Prohibition of acts of bribery

FI GROUP prohibits all forms of corruption, especially bribery, in both the public and private sectors. In this respect, our suppliers must conduct their business relationships in such a way as to rule out any action aimed at gaining an advantage over their competitors based on an unlawful act. In particular, the Supplier expressly assumes compliance with the applicable anti-bribery and corruption laws, and in particular the Singapore Penal Code.



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3.3 Prevention of Money Laundering

The prevention of money laundering and the financing of terrorism is one of FI GROUP's priorities in terms of legal compliance. For this reason, and within the framework of the due diligence measures that we must establish for the identification and knowledge of the natural or legal persons with whom we intend to establish business relations, our Suppliers must promote the monitoring and control of conduct related to money laundering and the financing of terrorism.

3.4 Fiscal responsibility

The Supplier of FI GROUP shall comply with its obligations related to the payment of taxes by putting in place measures to ensure the integrity of its accounting and financial system and the accuracy of its accounting books and records.

4 ETHICAL INTEGRITY

4.1 Conflicts of interest

FI GROUP's Supplier shall disclose any situation that may constitute a conflict of interest. In this regard, the Supplier shall disclose possible links with FI GROUP's employees, customers or suppliers that may affect the neutrality of our procurement process.

4.2 Transparency

Relations between FI GROUP and its suppliers shall be based on reciprocal transparency. The commercial, financial and/or business information provided by both parties shall be truthful, complete and provided under the Principle of Good Faith.

4.3 Respect for human rights

The Supplier shall respect the human and labour rights recognised in internationally accepted laws and practices. In particular, it shall comply with the guidelines of the United Nations Universal Declaration of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the provisions of the International Labour Organisation (ILO) in relation to child labour.



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5 INTEGRITY IN LABOUR MATTERS

5.1 Respect for occupational health and safety

The Supplier shall provide a safe working environment for its employees, and in particular in compliance with the applicable Occupational Health and Safety regulations.

5.2 Equal opportunities for men and women

The Supplier undertakes to take measures to prevent or detect situations of direct or indirect discrimination on grounds of sex, and especially those arising from maternity, the assumption of family obligations and marital status.

5.3 Prevention of Sexual and Gender-based Harassment

FI GROUP Providers undertake to develop internal measures to prevent and detect the occurrence within their organisation of any verbal or physical behaviour of a sexual nature, which has the purpose or has the effect of violating the dignity of a person, in particular when it creates an intimidating, degrading or offensive environment.

6 MARKET COMMITMENTS

6.1 Antitrust

The Supplier of FI GROUP shall comply with applicable antitrust laws, and shall avoid any conduct that may impair the competitive operation of the market.

6.2 Confidentiality

FI GROUP's Supplier shall comply with the Personal Data Protection regulations in force at all times, and shall maintain a duty of confidentiality with respect to all information to which they have access as a result of their business relations with FI GROUP, unless they have your authorisation to disclose it, or are acting in compliance with a legal obligation or court order. In particular, FI GROUP's Supplier undertakes to comply with the company's privacy and information security regulations to the extent applicable to it.



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6.3 Intellectual and Industrial Property

Suppliers must respect all regulations relating to intellectual and industrial property in their relations with FI GROUP. We do not permit the use of any tool or information that does not comply with or does not have the licences required by the applicable regulations.

6.4 Environment

The Supplier of FI GROUP undertakes:

- Strict compliance with national, regional and local regulations applicable to its activities,
 products and services in environmental matters.
- Promoting processes associated with energy efficiency that seek to minimise electricity consumption within each supplier's activity.
- Pay attention to the origin of the materials purchased, promoting those with a lower environmental impact.
- Manage the waste generated during the provision of the service in accordance with current regulations, prioritising its recovery and recycling.
- Promoting good environmental and social practices among its supplier partners.

7 WHISTLEBLOWING CHANNEL

FI GROUP provides its suppliers with a Whistleblowing Channel to report activities or behaviour that may contravene the provisions of this document. To this end, any complaints regarding Criminal Compliance may be filed through the corresponding complaint form that can be found on the company's corporate website.

FI GROUP guarantees that all communications will be treated confidentially and that there will be no retaliation of any kind against bona fide complainants.

8 Approval and dissemination

The Governing Body shall have the appropriate means for the dissemination, training and enforcement of this standard in FI GROUP.