



*Suppliers' Code of Ethics*



	<p>Suppliers' Code of Ethics</p>	<p>Code: DE-SGCP-RE-V00-06032023- Supplier Code of Ethics</p>
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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.

For this reason, it is essential for FI GROUP that its suppliers comply with certain standards of behaviour, aligned with our Code of Ethics and our Penal Compliance Management System.

## 2 Scope of application

Compliance with this Code of Ethics is mandatory for all FI GROUP suppliers, regardless of their sector of activity or geographical location.

For the purposes of this Code, "Supplier" is understood to be the natural or legal person, independent of FI GROUP, that provides services or supplies products. Suppliers must expressly accept the content of this Suppliers' Code of Ethics.

FI GROUP Suppliers shall observe business conduct governed by the following principles:

## 3 COMPLIANCE WITH THE LAW

### 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 any form of corruption, especially bribery, in both the public and private sectors. In this sense, our suppliers must develop their business relationships in such a way as to rule out any action aimed at gaining an advantage over their competitors based on an illegal act. In particular, the Supplier expressly assumes compliance with the applicable anti-bribery and corruption laws, and in particular the German Penal Code (Strafgesetzbuch).

### 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, in its consideration as an obligated subject of these

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regulations. 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

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

## 4 ETHICAL INTEGRITY

### 4.1 Conflicts of interest

FI GROUP Suppliers must report any situation that may constitute a conflict of interest. In this sense, the Supplier must inform of possible links with employees, clients or suppliers of FI GROUP that may affect the neutrality of our contracting 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 employment 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.

## 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.

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## 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 Suppliers undertake to develop internal measures to prevent and detect the occurrence 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

FI GROUP Suppliers shall comply with applicable antitrust laws and shall avoid any conduct that may harm the competitive functioning of the market.

## 6.2 Confidentiality


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

## 6.3 Intellectual and Industrial Property

The Suppliers shall 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 regulations that are applicable in each case.

## 6.4 Environment

FI GROUP Suppliers undertake:

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- Strict compliance with national, regional and local regulations applicable to their activities, products and services in environmental matters.
- Promoting processes associated with energy efficiency that seek to minimise electricity consumption within each supplier's activity.
- Be watchful 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 COMPLAINTS CHANNEL

FI GROUP provides its suppliers with a Whistleblower Channel for reporting activities or behaviour that may contravene the provisions of this document. For this purpose, any complaints regarding Penal Compliance may be submitted through the corresponding complaint form that can be found on the company's corporate website.

FI GROUP guarantees the confidential treatment of all communications, as well as the absence of reprisals of any kind against good faith whistleblowers.

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SUPPLIER