


## *CONTRACTS POLICY*



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## 1 Objective

The purpose of this Policy is to describe the management carried out by FI Group, Inc (hereinafter "FI GROUP") to comply with the requirements expressed in section 8.4 of the UNE 19601:2017 Standard, according to which the organisation must have controls in place to prevent, detect or manage criminal risks at an early stage and to ensure that these processes are being managed appropriately. In this case, it is a matter of establishing measures to manage crimes related to bribery and corruption (bribery, corruption in business).

The Administrative Body of FI GROUP is responsible for approving and updating the company's policies, which contain the guidelines that govern the organisation's actions.

This policy is dictated by the principles of Honesty, Excellence, Transparency, and Integrity by which the company is governed, without which it would not be possible to develop a responsible business model.

By means of this Contracts Policy, FI GROUP aims to establish the guidelines for the correct development of the purchasing activity, pursuing the optimisation of the relationship between cost, quality and performance in the purchase and contracting of all kinds of goods and services by FI GROUP, as well as its adaptation to the Code of Conduct and the Company's Penal Risk Prevention Plan.

It also aims to establish a framework of collaboration between the company and its suppliers that promotes solid and lasting business relationships, the achievement of mutual benefits and the fulfilment of the corporate social responsibility of the Entity and its suppliers.

Through this policy, FI GROUP seeks to ensure that all members of the organisation involved in the purchasing process comply with the provisions of existing anti-bribery regulations, establishing a basic framework for this purpose.

## 2 Scope

This policy is addressed to all members of FI GROUP regardless of the position or position they hold in the company, and<sup>1</sup> Stakeholders involved in the company's purchasing process.

This policy shall be made available to all members of the Organisation and Stakeholders who require it.

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<sup>1</sup> Stakeholders include Clients, Competitors, Suppliers, Collaborators, Public Bodies and the Community.

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### 3 Guidelines to be issued in implementation of this policy

The Company's procurement process shall be conducted in accordance with the following Guidelines:

**Lawfulness:** all business relationships that the company enters into with its suppliers must be in accordance with the law. FI GROUP shall not tolerate any conduct that may be carried out within a supplier contracting process that could imply corruption in business, or that implies non-compliance with commercial, labour or tax legislation or, in general, with the legal system.

**Projection of needs:** all procurement procedures shall be in accordance with the internal needs of FI GROUP.

**Participation:** in order to comply with the above principle, it is necessary that those departments that project their purchasing needs are involved in the process.

**Market image:** in the procurement of suppliers, multiple requests for quotations shall be required in order to ensure the general principle of competition, objectivity, transparency and non-discrimination.

This principle may only be waived by the Company's General Management in cases of contracting highly sensitive services, understood as those that affect strategic areas of the company's operations (for example, those related to compliance with tax, commercial or labour regulations), and whose main pillar in their provision is a relationship of trust.

**Qualification:** the choice of supplier should be made with regard to the one that is most qualified to provide the requested good or service.

**Confidentiality:** all suppliers providing services to the Company shall have a duty of confidentiality with respect to the data they obtain from the Company in their relationship.

**Supplier register:** an up-to-date database of the company's suppliers shall be maintained.

**Prevention of money laundering:** cash payments to the company's suppliers are prohibited. Payments to suppliers shall preferably be made by bank transfer or direct debit, and the corresponding certificate of ownership of the account shall be requested. Payments shall not be made to accounts whose ownership does not correspond to the company name of the supplier providing the service.

**Sustainable procurement:** Sustainable procurement will be promoted, meaning the purchase of goods and services that do not endanger the needs of future generations, minimising the use of natural resources and toxic materials as well as the emission of waste and pollutants.

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## 4 Protection of personal data

In accordance with the provisions of governing regional, national, international laws, and other applicable regulations on the protection of personal data, FI GROUP shall process the data collected through the supplier contracting procedure as data controller.

### 4.1 Contact details of the data controller and the data protection officer

Proprietor: FI GROUP

Registered Office: 1460 Broadway New York, NY 10036

Contact e-mail: [privacy@fi-group.com](mailto:privacy@fi-group.com)

Contact e-mail address of the Data Protection Officer: [privacy@fi-group.com](mailto:privacy@fi-group.com)

### 4.2 Purposes and legitimacy of the processing

The personal data that may be provided to us by the suppliers, the information and documents that are obtained within the contracting procedures shall be used for the purpose of evaluating the different offers that are made to FI GROUP, as well as for the purpose of referencing the contact personnel of each supplier, as well as invoicing data.

### 4.3 Data retention period

Personal data processed for this purpose shall be retained in the Suppliers' Register only for the time necessary and in accordance with the time limits set out in the data retention policy and procedure approved by FI GROUP.

### 4.4 Addressees

Access to the data shall be restricted to personnel of the Company's Finance department who are responsible for managing the supplier contracting process, or processes related to the invoicing thereof.

### 4.5 Rights

You may exercise your rights of access, rectification, limitation, deletion, portability and opposition at [privacy@fi-group.com](mailto:privacy@fi-group.com), as well as the right to lodge a complaint with a supervisory authority.

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## 5 Declaration of compliance

Compliance with the principles and requirements set out in this Policy is often a legal obligation or a standard, and all staff are expected to be aware of and respect the contents of this Policy.

The Compliance Body will be responsible for the implementation and compliance with this policy, as well as for its periodic review and for promoting actions for its adequate dissemination and compliance.

In the event that any FI GROUP employee or person affected by this policy should have any queries regarding compliance with this policy in relation to any particular situation in which they may find themselves, they may direct them to the following e-mail address: [international-f.ethics@fi-group.com](mailto:international-f.ethics@fi-group.com)

Likewise, a whistle-blowing channel has been set up through which non-compliance with this Policy can be reported to the Ethics Committee via the Company's website.

FI GROUP will respond immediately in the event of possible breaches of the provisions of this Policy, within the parameters established in the legislation in force and in the internal disciplinary procedures, which may result in the termination of business relations with business partners and/or Third Parties.

## 6 Approval and dissemination

The Management Body shall have the appropriate means for the dissemination, training and compliance with this policy in FI GROUP.