

CONTRACTS POLICY



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1 Target

The purpose of this Policy is to describe the management carried out by F. Initiatives, Société Privée à Responsabilité Limitée (hereinafter "FI BELGIUM") 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 properly managed. In this case, it is a matter of establishing measures to manage crimes related to bribery and corruption (bribery, corruption in business).

FI BELGIUM's Governing Body 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 Purchasing Policy, FI BELGIUM 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 BELGIUM, as well as its adaptation to the Code of Conduct and the Company's Criminal 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 BELGIUM seeks to ensure that all members of the organisation involved in the procurement process comply with existing anti-bribery standards by establishing a basic framework for this purpose.

2 Outreach

This policy is addressed to all members of FI BELGIUM regardless of their position or position in the company, and Stakeholders¹ who are involved in the company's purchasing process.

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

¹ Stakeholders include Customers, Competitors, Suppliers, Collaborators, Public Bodies and the Community.

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3 Guidelines 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 BELGIUM shall not tolerate any conduct that may be carried out within a supplier procurement process that could involve corruption in business, or that involves non-compliance with commercial, labour or tax legislation or, in general, with the legal system.

Projection of needs: all procurement procedures shall be in line with FI BELGIUM's internal needs.

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 the law of 30 July relative à la protection des personnes physiques à l'égard des traitements de données à caractère personal and other applicable legislation on the protection of personal data, FI BELGIUM shall process the data collected through the supplier recruitment procedure as data controller.

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

Proprietor: F. Initiatives, Société Privée à Responsabilité Limitée

Registered Office: Harenheidestraat 57, 1130 Brussel, Belgium

Tax Identification Number: 0665.883.719

Contact e-mail: privacy@fi-group.com

4.2 Purposes and legitimacy of the processing

Personal data provided to us by suppliers, information and documents obtained in the course of procurement procedures shall be used for the purpose of evaluating the different offers made to FI BELGIUM, 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 Supplier 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 BELGIUM.

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, 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.

Should any FI BELGIUM employee or person affected by this policy have any queries about compliance with this policy in relation to any particular situation they may be in, they may direct them to the following email address: comite.eticoES@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 BELGIUM shall respond immediately in the event of any breach of the provisions of this Policy, within the parameters established in current legislation and 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 provide appropriate means for the dissemination, training and enforcement of this policy at FI BELGIUM.