



Fincons Group Policy

# SUPPLIER CODE OF CONDUCT



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# 01 // Document Information

<b>Title</b>	Fincons Group Suppliers Code of Conduct
<b>Purpose</b>	The purpose is to describes principles that suppliers and partners must comply with to qualify.
<b>Prepared by</b>	Legal & Compliance Department
<b>Approved by</b>	CEO
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<b>Target group</b>	Suppliers and Partners
<b>Related documents</b>	
<b>References to documents</b>	ISO 27001; EU Regulation 2016/679
<b>Previous documents</b>	

## 02 // Introduction

Fincons Group's strict application of the highest standards of integrity, fairness, reliability and sustainability are at the basis of our capacity to create shared value and to establish solid relationships of trust with our stakeholders. We have built our reputation on the constant application of those principles in our daily activities. This is why we ask our suppliers and partners to share these principles with us, working together to offer to our customers and all our stakeholders the best solutions and performances throughout the entire implementation cycle of our projects.

The principles indicated in this document illustrate the commitment of our company and the commitment we expect from our suppliers, strongly recommended to continually improve their performance in compliance with the following principles and take all the appropriate actions to improve their sustainability approach.

The main areas of Fincons Group sustainable supply chain are the following:

- **Laws and Regulations;**
- **Work and Human Rights;**
- **Health & Safety and Environmental Protection;**
- **Business Practices;**
- **Privacy and Data Protection;**
- **Sustainable Procurement and Audit.**

## 03 // Laws and Regulations

Fincons Group expects Suppliers to always strictly comply with all and any applicable national and international laws and technical standards when conducting business.

Services and goods provided by Suppliers must even comply with the relevant industry technical standards on quality and safety and conform to the quality and safety standards potentially required.

We expect Suppliers to carefully comply with all the specifications Fincons Group may provide and, when in doubt, to promptly ask for assistance.

## 04 // Labour and Human Rights Principles

Fincons Group embraces the values expressed in the Universal Declaration of Human Rights and in the Fundamental Conventions of the International Labour Organization.

Suppliers must always behave in such a manner so as to comply with the conventions above and protect and promote human rights in all their relationships, and always consider their counterparts as professionals.

Fincons Group protects workers from acts of harassment and violence, both physical and mental. Fincons Group does not tolerate any form of illegal, child, forced or bonded labour, or practices that constitute modern forms of slavery and human trafficking.

Suppliers undertake to:

- guarantee staff working conditions that comply with the applicable local regulations, the collective agreements and the ILO conventions of reference in relation to working hours, overtime, holidays, wages, benefits and accommodation conditions, where provided. Wages must be paid directly to workers, regularly, without delay and without deductions not required by law;
- employ only workers aged above the minimum established by local regulations or the minimum school leaving age. Workers whose age is under 18 must be assigned to activities compatible with the protection and development of their physical and mental health;
- reject any form of forced, bonded and illegal labour, including modern forms of slavery and human trafficking. Workers must not in any case be asked to pay recruitment or employment fees, or asked to deposit money or identity documents. They must not be subjected to restrictions of their freedom of movement and resignation;
- grant to workers the freedom of association and the right of collective bargaining and, if those rights are limited or prohibited by the applicable local regulations, facilitate the adoption of alternative legal systems of dialogue with workers.

#### **4.1 Working Hours**

Suppliers shall comply with all applicable national and international provisions of international labour standards and industry standards on working hours. In addition, Suppliers shall provide weekly rest periods, annual/ national holidays as well as any parental leave entitlements, sick/ medical leave or any other leave entitlements allowed by the applicable laws and relevant industry standards. Under no circumstances shall work weeks exceed the maximum permitted under applicable laws and regulations; overtime should be voluntary and not be demanded on a regular basis.

#### **4.2 Wages and Benefits**

Suppliers shall comply with all applicable laws and collective agreements regarding wages and benefits. In addition to normal wages, workers must be paid for overtime hours at the rate specified in law or collective agreements and must receive benefits that meet legal requirements. In addition to the above, Suppliers shall ensure that their workers receive decent, regular and adequate wages.

#### **4.3 Non-Discrimination**

Suppliers shall not discriminate in hiring and in employment practices on the basis of gender, race, color, religion, sexual orientation, age, physical ability, political opinion, nationality, social or ethnic origin, union membership. Suppliers shall always treat their employees and workers with fairness, respect and dignity, guaranteeing equal opportunities to all; workers shall not be subject to physical, sexual or psychological abuse, harassment or threats in the workplace.

#### **4.4 Prevention of Forced Labour**

Suppliers shall not use or benefit from any form of forced labour, exacted under the threat of penalty and for which the worker has not offered themselves voluntarily. Likewise, workers shall be free to withdraw from their employment contracts, in line with stipulated national legislation, without fear of retaliation or penalty. Fincons Group requests Suppliers to not engage or take advantage in the use of forced or bonded labour, involuntary prison labour, slavery, or trafficking of persons. Workers shall not be forced to deposit documents, lodge deposits or security payments.

#### **4.5 Child Labour**

According to the International Labour Organization, child labour refers to any activity that is harmful for child development that could prejudice their health or prevents them from attending compulsory schooling. Fincons Group is against using any form of child labour and believes that completely eradicating child labour is ultimately in the best interests of children. We know that the biggest driver of child labour is extreme poverty, so we request that Suppliers engage in develop or participate in contributing to policies and programmes to reduce extreme poverty in the best interest of every child and engage in the effective abolition of any illegal form of child labour. Suppliers shall comply with the relevant rules set forth by the International Labour Organization (ILO). Suppliers shall not employ any person below the legal age of employment, as determined by The International Labour Organization's Fundamental Conventions and in respect of the local, social and legal framework if it sets a higher minimum age. If local laws allow the legal employment of young workers, Suppliers shall protect young persons of legal working age, until the age of 18, ensuring that they are treated according to law; this includes measures to avoid hazardous and night jobs that could jeopardise their health, safety or morals.

#### **4.6 Freedom of Association**

Suppliers shall recognize the right of workers to join workers' organizations and the right of these workers to collective bargaining, if they choose. Likewise, Suppliers shall understand the importance of direct engagement between workers and management and promote open communication regarding working conditions without fear by workers of harassment, intimidation or reprisal. Suppliers shall acknowledge the right of freedom of speech to every worker.



# 05 // Principles of Health & Safety and Environmental Protection

## 5.1 Health and Safety

Workers' health and safety, well-being is very important to Fincons Group. Suppliers shall provide and maintain a safe work environment and integrate sound health and safety management practices into their business.

This should include occupational health and safety risk assessment, implementation of adequate hierarchy of controls, communication and training to the workers.

- Workers should have knowledge of inherent risk involved in the process (e.g. physical risk etc.), access to protection. They have a recognized right to refuse unsafe work and to report unhealthy working conditions.
- Suppliers shall provide workers with appropriate personal protective equipment and properly maintain physical guards, interlocks and barriers where machinery presents an injury hazard to workers.
- Suppliers shall commit to have no deviation to health and safety local regulations, including a periodic health check-up of workers.
- Physically demanding work is to be identified, evaluated and controlled. Onsite training on workplace Health and Safety must be done. Ready access to potable water, sanitary food preparation and clean toilets should be made accessible.
- When provided by the Suppliers, housing facilities and food should be maintained in hygienic conditions in accordance to local laws.
- Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health can be used as a reference.

## 5.2. ENVIRONMENT

Fincons Group is aware of the importance of safeguarding the environment and for this reason, it aims at protecting the natural resources by adopting, in strategic choices and business processes, the principles of environmental sustainability.

Fincons Group has based its business on the respect for the surrounding environment, applying the local and international regulations on energy efficiency, protection of water resources, waste disposal and emissions into the atmosphere. This commitment has resulted in the implementation and maintenance of an Environmental Management System at its sites and in the certification according to the international standard ISO 14001.

Fincons Group expects its Suppliers to commit to raising awareness among its employees of environmental responsibility issues. Fincons Group believes that the sensitivity and awareness of human resources is the only truly effective way to ensure that environmental management policies and systems are implemented at every level of the company organization. In this perspective, the development of a widespread and committed environmental awareness must take place in full respect and in collaboration with the local communities in which it operates, promoting a network approach to the social and environmental challenges they have to face.

Therefore, Fincons Group:

- encourages its Suppliers to evaluate the entity of the environmental impact of the entire production chain in order to reduce their environmental footprint;
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- promotes all the activities aimed at reducing the emissions of pollutants and greenhouse gas, at reducing resource use and at recycling materials (including water) and any action meant for empowering energetic efficiency;
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- endorses Suppliers in correctly manage, store and dispose materials, processing residuals and hazardous waste in a safe manner and in accordance with the law.

## 06 // Business Practices

Fincons Group expects from its employees and its Suppliers the highest standards of fair business practices and ethical conduct in all of endeavors.

- **Business Ethics:** Suppliers shall conduct their business in an ethical manner and act with integrity. Suppliers shall always be ethical in every aspect of their business, including relationships, practices, purchasing and operations. All forms of bribery, corruption, extortion and embezzlement are clearly prohibited. Suppliers are also expected to report to Fincons Group any business misconduct.
- **Transparency:** in doing business and reporting Information regarding Suppliers' labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.
- **Intellectual Property:** Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer information is to be safeguarded. Suppliers should be aware of counterfeiting risks and to all extent possible, protect Fincons Group from receiving counterfeit products or sub-components.
- **Partnering in Global Initiative:** Fincons Group encourages its suppliers to actively engage in its global initiatives. Effective actions, especially related to climate change, decent work and social excellence is a Fincons Group requirement for 'recommended' and strategic suppliers.

## **07 // Privacy and Data Protection**

Suppliers shall comply with all applicable data protection and information security laws when processing information for or on behalf of Fincons Group. Suppliers shall handle and process data in accordance with Fincons Group's instructions. Suppliers shall at all times have implemented adequate operational, technical and organizational measures to protect data against accidental or unlawful destruction, loss or alteration and unauthorized disclosure or access.

Moreover, Suppliers will protect Fincons Group confidential and proprietary information and act to prevent its misuse, theft, fraud, or improper disclosure. Suppliers must take all due care in handling, discussing, or transmitting confidential or proprietary information that could affect Fincons Group, its employees, its customers, the business community, or the general public.

For this reason, Fincons Group expects its Suppliers to implement and maintain an Information Security Management System according to the international standard ISO 27001 or equivalent.

## **08 // Sustainable Procurement and Audit**

Suppliers shall engage in procurement in a responsible manner.

They shall engage socially and economically different categories of suppliers through inclusive sourcing processes that promote equal opportunities. It is expected Suppliers shall communicate the above principles as a Fincons Group Supplier to their own suppliers and shall monitor their suppliers' compliance. It is expected Suppliers will extend the Fincons Group supplier engagement with their own suppliers, especially in field of climate change, decent work and social excellence. Fincons Group reserves the right to verify the supplier's compliance.

Fincons Group will not engage in commercial relationships with Suppliers who do not accept the principles set out in this document. Fincons Group reserves the right to conduct pre-announced inspections of Suppliers and their business practices, records and facilities. In case Fincons Group becomes aware of any actions or conditions not in compliance with this Code of Conduct, it could demand corrective measures and reserves the right to terminate the commercial agreement.



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