

TRADICIÓN  FAMILIAR

FINCA  
RODMA

BODEGAS Y VIÑEDOS

**CODE OF ETHICAL RELATIONSHIP  
WITH PROVIDERS**

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## 1 INTRODUCTION

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FINCA RODMA (hereinafter “**FINCA RODMA**”) considers its Providers and collaborating companies an indispensable part of achieving their objectives of growth and of the improvement of the quality of the value chain, seeking to establish relationships with them based on trust and mutual benefit.

While Providers have their own independent and autonomous structures, the acts of a Provider may cause negative results, whether legal or reputational, that affect FINCA RODMA.

Therefore, it is necessary to reflect in this Code of Ethics of Relationships with Suppliers (hereinafter referred to as the “**Code**”) a series of ethical and integrity requirements that must be met by any Provider that intends to have a relationship with FINCA RODMA.

These ethical requirements are based on compliance with statutory regulations as well as the ethical principles guiding FINCA RODMA activity, all of this with the firm belief that relationships between Providers and FINCA RODMA governed by ethics, professionalism, honesty, good faith and compliance with the law brings an undeniable value for both FINCA RODMA and its Providers, and the society of which both are part.

In turn, this Code originates from the Code of Ethics and Conduct of FINCA RODMA.

## 2 ETHICAL PRINCIPLES OF FINCA RODMA AND STANDARDS OF CONDUCT TO BE COMPLIED WITH BY PROVIDERS

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The guiding principles that must guide the ethical behaviour of FINCA RODMA Providers, and that of its subcontractors, are focused on the following areas:

### 2.1 INTEGRITY AND ETHICS

#### 2.1.1 COMPLIANCE WITH THE LAW

All FINCA RODMA Providers are obliged to comply with and abide by current law, regardless of their range and scope of application, in the performance of their respective work and activities. In this regard, Providers must be current with their obligations to the different administrations at all times.

#### 2.1.2 RESPECT FOR HUMAN RIGHTS AND FOR PERSONS

All FINCA RODMA Providers must demonstrate exemplary and honourable behaviour, must respect the internationally recognised human rights stated in the Universal Declaration of Human Rights and the Ethical Trading Initiative Code. Not including and not limited to the following, the Provider shall:

- Maintain legal labour practices with their employees in accordance with international standards (Conventions of the International Labour Organisation) and with the applicable legislation of the country where they operate.
- Not allow any form of forced labour.
- Not allow child labour.

- Allow freedom of association and the collective bargaining of their employees.
- Treat all employees with dignity and respect, avoiding any behaviour that may lead to discrimination on any grounds for any reason (sex, race, religion, sexual orientation, marital status, age, political affiliation, disability, etc.)
- Ensure that their employees labour is provided in under conditions free of coercion and adequate in respect of their workday, work/life balance, minimum wage, etc.
- Pay special attention to the safety of employees, which must be verified in each task that is performed by any employee, providing them with the facilities, training, procedures and protective equipment necessary to ensure the safe performance of their activity.

### 2.1.3 PROHIBITION OF CORRUPT PRACTICES

FINCA RODMA firmly believes in the business relationships developed based on transparency and honesty and, therefore rejects any corrupt behaviour. All FINCA RODMA Providers must undertake to prevent all forms of corruption and, specifically,

- Any kind of bribery, blackmail, extortion, facilitation payment, influence trafficking or money laundering
- Offer or acceptance of any kind of gifts and/or invitations in cash or in kind for or from FINCA RODMA officials and/or employees for the purpose of influencing their willingness to maintain or obtain some kind of advantage or business.
- Offer or acceptance of any cash or in-kind payments related to their contracting with FINCA RODMA for the purpose of obtaining or maintaining any business or advantage for themselves that might lead to conflict between the interests of the Provider and those FINCA RODMA.

### 2.1.4 CONFIDENTIALITY OF INFORMATION AND PROTECTION OF PERSONAL DATA

All FINCA RODMA Providers have the duty and obligation to maintain secrecy regarding all information related to any FINCA RODMA company and/or third parties that may be classified as privileged, confidential, reserved and/or secret. Consequently, it may not be disclosed nor, much less, used for personal benefit. Specifically, FINCA RODMA confidential information shall be understood as any information that, because it is not public, affects the activity and details of clients, of market, financial data, methods or processes, and any information provided to FINCA RODMA by third parties that is subject to confidentiality commitments. This information may not be disclosed for any reason by the Provider or their employees without the express authorisation of the responsible party from FINCA RODMA.

In addition, as long as this information is held by the Provider, it must be zealously protected by the relevant security measures, and © shall be duly notified thereby

of any incident that occurs regarding any confidential information to which they have access.

In addition, all FINCA RODMA Providers must comply with the current legislation regarding the protection of personal data, respecting the right to privacy and protecting the personal data entrusted by their clients, employees, providers and external collaborators, candidates in the selection process or other persons.

#### 2.1.5 FAIR COMPETITION

FINCA RODMA Providers must comply at all times with rules regarding the market and competition, refraining from taking measures that may somehow violate or limit free competition in the market or harm consumers.

### 2.2 **QUALITY, INNOVATION AND CONTINUOUS IMPROVEMENT**

FINCA RODMA Providers must ensure the quality and safety of their products. The principle of food safety is an unwavering principle for FINCA RODMA that must be respected in any event at all times for any type of product or service provided that may be likely to be included or come into contact with foods produced or marketed by FINCA RODMA.

In any event, the Providers management systems shall operate on the premise of innovation and continuous improvement, encouraging active collaboration between the Provider and FINCA RODMA based on transparency and truth and appropriate information or advice. In no case may wrong, ambiguous or less-than-rigorous information be provided that may induce FINCA RODMA to error or to take wrong decisions.

### 2.3 **ENVIRONMENTAL RESPONSIBILITY**

In respect of the environment, in addition to being a legal obligation, it is a primary ethical premise at FINCA RODMA that is expressed in internal and external regulatory obligations the breach of which not only can result in harmful legal consequences. It may also cause irreparable reputational damage.

It is necessary for the Provider comply with environmental legislation (waste, atmospheric emissions, noise, spills, soil degradation. etc.), dedicating special effort to achieving increased recyclability of their products and/or containers and always performing its activities with the required administrative authorisations and licences. In addition, Providers of goods and services of animal origin must ensure and substantiate compliance with requirements related to animal welfare.

## **3 COMPULSORY COMPLIANCE WITH THIS CODE AND COMMUNICATION OF BREACHES**

All FINCA RODMA Providers must comply with the principles, standards and guidelines contained in this Code and enforce them. In this regard, FINCA RODMA reserves the right to periodically review and audit compliance by Providers of this Code and these Providers must collaborate on this compliance check.

In the event that there is any suspicion whatsoever of the breach of the provisions of this Code, all Providers must immediately inform FINCA RODMA through the following:

<https://channel.globalsuitesolutions.com/queseriasentrepinares>

This Ethical Channel has the guarantees necessary to maintain the security of communications and ensures the required confidentiality. In any case, the Provider complainant shall be protected against any form of retaliation, and their identity shall be safeguarded.

#### **4 BREACH OF THIS CODE**

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FINCA RODMA may take measures, where appropriate and to whatever extent determined, regarding Providers who breach the provisions of this Code.

In any case, without prejudice to the early termination of the relationship with the breaching Provider, a breach of the provisions provided for in this document – or of any protocols or procedures that implement it and supplement it – may give rise, where appropriate, to the exercise of legal action against the Provider.