












FS	Felix Solis document	ETI	BSCI	Additional Requirements
<p>Forced labour</p> <p>Job is freely chosen. Workers are not forced to work; nobody works in an involuntary way.</p>	<p>Security on hiring policy</p> <p>Internal regime regulation</p> <p>Spanish Constitution: Title I, chapter II, section 2º, article 35</p> <p>Labour law: article 2</p> <p>Law on the statute of rights for workers: chapter I, section 2º. Article 4</p>	<p>Employment is freely chosen</p> <ul style="list-style-type: none"> There is no forced, bonded or involuntary prison labour. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice  <p>C105 - Abolition of Forced Labour Convention, 1957</p> <p>This convention forbids any forced or mandatory labour –work after a criminal conviction included- as a means of:</p> <ul style="list-style-type: none"> Political coercion, punishments related to the freedom of expression, Labour force protests with financial objectives Labour discipline Punishments related to the right to strike, racial, social, national 	<p>No Bonded Labour</p> <p>Business partners shall not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour</p> <p>ILO Conventions Nº. 29 and 105</p> 	<p>Martin&Servera</p> <p>(2.3 from M&S's Code)</p> <p>All workers are free to leave their work at the end of the workday.</p> <p>UK</p> <p>Modern Slavery Act</p> <p>(See document annex 1)</p> <p>Daniel and Weronika Story</p> <p>https://youtu.be/q-5GVA5Ig-Y</p> <p>http://stronger2gether.org/training/</p>


FS	Felix Solis document	ETI	BSCI	Additional Requirements
<p>Freedom of Association</p> <p>Workers have freedom of association and collective bargaining</p>	<p>Internal regime regulation.</p> <p>(Point 5.2)</p>	<p>Freedom of association and the right to collective bargaining are Respected</p> <ul style="list-style-type: none"> Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining. 	<p>The rights of Freedom of Association and Collective Bargaining</p> <p>Business partners shall: (a) respect the right of workers to form unions in a free and democratic way; (b) not discriminate against workers because of trade union membership and (c) respect workers' right to bargain collectively.</p> <p>ILO Coventions No 87, 98, 135 and 154</p> 	

FS	Felix Solis document	ETI	BSCI	Aditonal Requirements
<p>Health and safety</p> <p>Work conditions are always safe and healthy</p>	<ul style="list-style-type: none"> ✓ Risk evaluations: Preventive measures and personal protective equipment (PPE) ✓ Information sheets ✓ Training (Workstation and specific training) ✓ Maintenance of <ul style="list-style-type: none"> ➤ Fire extinguisher system ➤ PPE's ➤ First-aid kits ✓ Security inspections ✓ Emergency measures ✓ Accident investigations 	<p>Working conditions are safe and hygienic</p> <ul style="list-style-type: none"> • A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment. • Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. • Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. • Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. • The company observing the code shall assign responsibility for health and safety to a senior management representative. 	<p>Occupational Health and Safety</p> <p>Business partners observe this principle when they respect the right to healthy working and living conditions of workers and local communities, without prejudice to the specific expectations set out hereunder.</p> <p>ILO Convention No. 155, 184 ILO Recommendation No. 164</p> 	<p>Martin&Servera</p> <p>(7.6 from M&S's Code)</p> <p>Personal protective equipment is provided to every worker and special protection is in place for vulnerable workers (pregnant, etc.)</p> <p>(7.7 from M&S's Code)</p> <p>Provided equipment will be always free of charge.</p> <p>(7.9 from M&S's Code)</p> <p>Medical assistance is always available for all the workers, in the work place or in the nearest hospital.</p>




FS	Felix Solis document	ETI	BSCI	Additional Requirements
<p>Child labour</p> <p>No childish labour is allowed</p>	<ul style="list-style-type: none"> As is established in the International labour organization conventions (ILO), it is forbidden to hire workers under 18 years. (Minimum age for work convention, 1973, number 138 / Law on the statute of rights for workers, article 6) 	<p>Child labour shall not be used</p> <ul style="list-style-type: none"> There shall be no new recruitment of child labour. Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices. Children and young persons under 18 shall not be employed at night or in hazardous conditions. These policies and procedures shall conform to the provisions of the relevant ILO standards. 	<p>No Child Labour</p> <p>Business partners observe this principle when they do not employ directly or indirectly, children below the minimum age of completion of compulsory schooling as defined by law</p>  <p>Special care is to be taken on the occasion of the dismissal of children, as they can move into more hazardous employment, such as prostitution or drug trafficking</p> <p>In removing children from the workplace, business partners should identify in a proactive manner, measures to ensure the protection of affected children.</p> <p>ILO Conventions No. 79, 138, 182 ILO Recommendation No.146</p> 	

Ethical Commitment



FS	Felix Solis document	ETI	BSCI	Additional Requirements
<p>Wages</p> <p>Wages meet the requirements established in the law for our industry.</p>	<p>Internal regime regulation (Point 5.2)</p> <p>Wages are established according to the winegrowing agreement dependent on the professional category. Wages are always beyond the minimum salary</p>	<p>Living wages are paid</p> <ul style="list-style-type: none"> Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded. 	<p>Fair remuneration</p> <p>Our site respect the principles related to fair remuneration</p> <p>ILO Convention No. 29, 95, 131</p> 	<p>Martin&Servera</p> <p>(8.4 from M&S's Code)</p> <p>Wages are paid regularly based on the skills of the workers.</p>



FS	Felix Solis document	ETI	BSCI	Aditonal Requirements
<p>Hours of work</p> <p>Working hours are not excessive and according to the law.</p>		<p>Working hours are not excessive</p> <ul style="list-style-type: none"> Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.* All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below. Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met: <ul style="list-style-type: none"> this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers’ organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers’ health and safety; 	<p>Decent Working Hours</p> <p>Our site is respectful about working hours reflected in the law.</p> <p>ILO Convention No. 1 and 14</p> <p>ILO Recommendation No.116</p> 	

Ethical Commitment


FS	Felix Solis document	ETI	BSCI	Additional Requirements
		<ul style="list-style-type: none"> ○ and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. • Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period. 		
<p>Non-discrimination</p> <p>There is no discrimination related to hiring on account of caste, race, descent, sexual orientation or political affiliation</p>	<p>Internal regime regulation (Point 5.2)</p>	<p>No discrimination is practiced</p> <ul style="list-style-type: none"> • There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. 	<p>No discrimination</p> <p>Our site not discriminate any worker and provides all of them the same opportunities</p> <p>ILO Conventions No. 100, 111, 143, 158, 159, 169, 183</p> 	<p>Martin&Servera (5.2 from M&S's Code)</p> <p>The site has a grievance mechanism available to report any kind of discrimination by the workers</p>

Ethical Commitment

FS	Felix Solis document	ETI	BSCI	Additional Requirements
<p>Regular employment</p> <p>Our site provides regular employment. Work is based on the recognized labour relationships, and national practices</p>	<p>Security on hiring policy</p>	<p>Regular employment is provided</p> <ul style="list-style-type: none"> To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment. 	<p>No Precarious Employment</p> <p>Work is performed on the basis of a recognised and documented employment relationship, established in compliance with national legislation, custom or practice and international labour standards, whichever provides greater protection.</p> 	<p>Martin&Servera</p> <p>(10.2 from M&S's Code)</p> <p>The company provides to every worker a copy of their contract.</p> <p>(10.4 from M&S's Code)</p> <p>Considerations are taken for family mediation.</p>

FS	Felix Solis document	ETI	BSCI	Additional Requirements
<p>Harsh treatment</p> <p>It is forbidden any mistreat, physical or verbal punishment as well as any kind of intimidation</p>	<p>Internal regime regulation (Point 5.2)</p>	<p>No harsh or inhumane treatment is allowed</p> <ul style="list-style-type: none"> Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. 		<p>Martin&Servera</p> <p>(6.4 from M&S's Code)</p> <p>Hygiene facilities are available for all the workers</p> <p>(6.2 from M&S's Code)</p> <p>Disciplinary procedures are explained on the Internal regime regulation and are published on the canteen.</p>
<p>No corrupt behaviours</p> <p>It is not allowed any corrupted action, extortion, misappropriation or bribery.</p>	<p>Internal regime regulation. (Point 5.8)</p>		<p>Ethical Business Behaviour</p> <p>Our site not tolerare any corrupted action, extortion, misappropriation or bribery</p> 	

Ethical Commitment

FS	Felix Solis document	ETI	BSCI	Aditonal Requirements
Environmental protection	Quality, food safety, environment and security policy		Protection of the Environment Our site in enviromentally friendly 	

Felix Solis Modern Slavery Policy Statement 2018

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. Felix Solis recognises that as a large organisation, it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

We are committed to preventing slavery and human trafficking in our business activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors (e.g. construction), suppliers (e.g. employment agencies or dry goods suppliers) and other business partners, and we include specific prohibitions in our contracts against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will in turn hold their own suppliers to the same high standards.

We undertake due diligence when considering taking on new suppliers, and are in the process of reviewing our existing suppliers. This due diligence includes:

- We have a programme of regular contact with our trading partners and it is part of that programme to spread, as far as possible, our ethical policy and the commitment of our partners about good practices in relation to their workforce and contractors.
- Understanding our supply chain so as to identify and assess particular product or geographical risks of modern slavery and human trafficking.
- All contracts must contain clauses requiring our suppliers to adopt similar standards
- Terminating our relationship with suppliers that fail to improve their performance in line with an action plan or violate our supplier code of conduct.

Our Ethical policy is adopted with the commitment under the compromise of the different Ethical codes supported in all over the world: The ethical Trade Initiative, the BSCI code and our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

The commitment with the core values established on the Ethical codes is developed in our Ethical compromise document. This document show the company's internal statements set out to develop the Felix Solis Compromise.

We encourage all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature. The Modern Slavery Act 2015 (the "Act") is specifically mentioned within this policy which is published in the Company handbook.

Training

All our staff and contractors are trained in this policy. It is mandatory for all members of staff to familiarise themselves with this statement and policy, and especially for Directors, buyers, account managers, contract managers and sales teams.

Anexo 1: Ethical Commitment

Felix Solis Modern Slavery Policy Statement 2018

It forms part of the induction process for new employees, trading partners and contractors.

It is available in the languages relevant in our business. The Company requires all employees working in supply chain management and relevant roles to complete training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking and what should be done if this activity is suspected.

Awareness training is provided for all main board members and entity directors and any other staff in relevant and appropriate roles.

Board Approval

This statement has been approved by the Main Board of Felix Solis who will review and update it annually.

This statement is made pursuant of section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year.

Modern Slavery Policy Statement 2018

Signed:

CEO Felix Solis