

**EBRO FOODS CODE OF  
CONDUCT**

# **EBRO FOODS GROUP CODE OF CONDUCT**

## **I. GENERAL**

### **1. Introduction**

This Code of Conduct (the "**Code**" or "**Code of Conduct**") is an update to the Code of Conduct approved in 2015 by the Board of Directors of Ebro Foods, S.A. ("**Ebro Foods**") and provides guidance on how to act in the internal and external relations of the people and companies that make up the group led by Ebro Foods (the "**Ebro Foods Group**" or the "**Group**"), reinforcing the values that distinguish us and establishing a fundamental reference to be followed by the people and companies of the Ebro Foods Group.

The Code is conceived as an essential element within the crime prevention model implemented in the Ebro Foods Group; therefore, it is important that it is known and observed by all people who fall within its scope.

### **2. Definitions**

"**Code**" or "**Code of Conduct**": this document.

"**Verification, Control and Sustainability Committee**": the Verification, Control and Sustainability Committee of Ebro Foods.

"**Ebro Foods**": The company Ebro Foods, S.A.

"**Ebro Foods Group**" or "**Group**": Ebro Foods, S.A. and all companies directly or indirectly controlled by it, within the meaning of Article 42 of the Commercial Code.

"**Professionals**": employees, managers and directors of any company in the Ebro Foods Group, including permanent representatives of company directors.

"**Compliance Unit**": Committee that reports to the Control and Sustainability Committee, which has the initiative, autonomy and resources necessary to carry out its tasks. Among the other tasks covered by Ebro Foods' internal regulations, these tasks include coordinating, supervising and managing the proper functioning of the Group's crime prevention model and assisting the Committee in supervising compliance, distribution and interpretation of the Code of Conduct. Its basic rules are set out in the Internal Code of Market Conduct.

### **3. Objectives**

The Code, which establishes the principles and values that must inspire the actions of the companies and individuals that are part of the Ebro Foods Group and the binding rules for professionals in the exercise of their functions, aims to:

- To be a formal, institutional reference for personal and professional conduct.
- To ensure the responsible and ethical behaviour of all professionals in their work.

- Reduce the element of subjectivity in personal interpretations of moral and ethical principles.
- Create a standardisation tool to ensure the progressive implementation of the ten principles of the UN Global Compact across the Group.
- To grow responsibly and committed to all our stakeholders.

#### **4. Scope**

**4.1.** The Code is binding for all professional figures, regardless of their hierarchical level, position and geographical location.

**4.2.** The Code is also binding, as set out herein, on the customers, suppliers, shareholders and other stakeholders with whom the Ebro Foods Group interacts in its operations, to the extent that the values, principles and rules set out herein may be applicable to them and the Group has the necessary powers to implement them.

**4.3.** The scope of application may be extended to any other person linked to the Group or to professional figures when, by the very nature of the aforementioned relationship, their actions may affect in any way the reputation of the Group or any of its companies.

**4.4.** The contents of the Code will prevail over any contradictory internal rules, unless the latter establish more stringent behavioral requirements.

**4.5.** Professionals bound by other codes of conduct, under the national laws governing their companies, are nevertheless bound to accept and comply with the Code. Appropriate coordination will be established, where possible, to ensure that the principles, vision and values of the Code of Conduct are incorporated into the principles, vision and values of the Code of Conduct.

**4.6.** The persons referred to in the previous paragraphs will be responsible for ensuring compliance with and compliance with the Code, regardless of their respective positions within the Group. Failure to comply with the Code will not be tolerated and anyone who reports suspicious or illegal behavior or activity in violation of this Code will be sanctioned for this reason.

**4.7.** Any violation or violation of the Code that is qualified as a labor offense will be sanctioned under the labor law, without prejudice to any other liability that the offender may incur and the corrective measures that may be adopted by the various companies of the Group in application of the laws in force.

#### **5. Monitoring and control of the application of the Code of Conduct**

**5.1.** The Group shall progressively adopt such measures as may be deemed necessary from time to time to ensure compliance with all the values, principles and rules set out in this

Code, disclosing its content among the recipients and resolving any doubts arising from its application.

**5.2.** The Verification, Control and Sustainability Committee has the task of monitoring and controlling the application of the Code, assisted by the Compliance Unit.

**5.3.** The Audit, Control and Sustainability Committee will report regularly to the Board of Directors of Ebro Foods on any questions raised regarding the interpretation and application of the Code of Conduct, how they have been resolved, the level of compliance with the Code and any incident related to it or violation thereof.

## **6. Code Development and Modification**

**6.1.** The Code of Conduct, by its nature, cannot cover all potential situations, but is limited to establishing fundamental criteria to guide the conduct of professional figures and, if necessary, resolve any doubts that may arise in the performance of their professional duties.

**6.2.** Ebro Foods, as the parent company, or each of the companies of the Ebro Foods Group, may establish and develop specific rules and procedures for action in their respective sectors of activity and in relation to certain matters, respecting at all times the vision, values and rules of conduct set out in the Code.

**6.3.** The Verification, Control and Sustainability Committee will be immediately informed of any non-compliance with the Code of Conduct, including when required by the national laws in force in any of the countries in which the Ebro Foods Group operates. Such communication may be made by the Professional concerned or by any other Professional who becomes aware of it, through the reporting channel governed by Section VII of the Code.

## **II. MISSION, VISION AND VALUES OF THE EBRO FOODS GROUP**

### **7. Mission, vision and values**

**7.1.** The Group's mission is to research, create, produce and market foods with high added value that, in addition to meeting the nutritional needs of the community, improve the health and well-being of the same.

**7.2.** The Group's vision is to achieve sustainable growth while ensuring ethical behavior and the personal and professional integrity of its business, creating value for shareholders and other stakeholders, minimizing the impact of its activities on the environment, improving the quality of life of the community and meeting the needs of its customers and consumers.

**7.3.** The values upheld by the Group are:

- Leadership
- Transparency
- Honesty

- Responsibility
- Integrity
- Culture of effort
- Orientation towards value creation
- Responsibility towards the environment
- Vocation to service
- Orientation towards people
- Innovation
- Long-term sustainability
- Strict compliance with current legislation

### **III. GENERAL PRINCIPLES OF THE EBRO FOODS GROUP**

#### **8. General principles**

The Group's policy goes beyond the mere observation and compliance with all laws and regulations applicable to each activity, which implies:

- Do not make any decisions without considering their ethical value and their impact on the environment.
- Rejecting unethical alternatives, as well as others are rejected on the grounds that they are economically unsustainable.
- Take into account the side effects of each individual action.
- When making decisions, consider the stakeholders involved and respect their rights.
- Harmonize ethical requirements with other achievements.
- Always seek the greatest possible credibility and transparency.
- Refrain from misusing the market position of the Ebro Foods Group. It is not inappropriate to mention the advantages that derive from our position, obtained thanks to the legitimate success of our activities, provided that there is no imposition on other persons or organizations.
- Involve professionals in actions to improve the present and future performance of the company.

- Continuously train professionals as a basic element to achieve excellence, leadership and timely adaptation to changing environmental circumstances.

#### **IV. THE PROFESSIONAL FIGURES OF THE EBRO FOODS GROUP**

##### **9. Commitment to human rights**

**9.1.** Relations between all professional figures must always be based on respect for the dignity of others and non-discrimination.

**9.2.** The Group prohibits the abuse of authority and any type of physical or psychological harassment, as well as any other behavior that may generate an intimidating, offensive or hostile work environment.

**9.3.** The Group will not employ minors and rejects any form of direct or indirect child labour.

**9.4.** No company in the Group is forced and compulsory labour permitted.

**9.5.** The Group promotes and supports the principle of equal treatment and equal opportunities for all professionals, regardless of race, colour, nationality, ethnic origin, religion, sex, political or sexual inclinations, marital status, age, disability or family responsibilities, as the guiding principle of all human resources policies and applicable in the recruitment of professionals. in training, career opportunities, salary levels and all other aspects of relations with professional figures.

**9.6.** The Group does not prevent or limit the exercise by its professionals of the right to freedom of association, trade union membership, activity and collective bargaining, in accordance with the laws and regulations in force.

**9.7.** The Group respects and promotes human rights and recognises that they are fundamental and universal rights that must be interpreted and recognised in accordance with international laws and practices; in particular the United Nations Universal Declaration of Human Rights and the principles proclaimed by the International Labour Organization (ILO).

##### **10. Professional loyalty**

The Group's professionals act at all times in the best interest of the company, with loyalty and with an appropriate use of the means and resources made available to them, avoiding any action that may be harmful to the company. In particular, in accordance with that general rule, they must:

- (i) Protect and take care of the Group's assets to which it has or to which it has access, not making any use of them beyond that necessary for the performance of its functions.
- (ii) Ensure that expenses are made solely to fulfill their job responsibilities.

(iii) Take every precaution to protect your computer, data processing and telephony systems, paying particular attention to the implementation of available security measures and avoiding any inappropriate use of your telephone, e-mail, Internet access and other devices made available.

(iv) Respect the industrial property and rights of use corresponding to the Group in relation to any tool or work developed or created within the Group, whether through their own professional work or that of third parties. Therefore, they must not use these tools outside the professional scope of their work activity and must return all the material containing them upon request.

(v) Comply with applicable data protection laws and regulations, treating all personal information as confidential.

(vi) Use the image, name or trademarks of the Group or any of its companies exclusively for the proper performance of their professional duties within the Group.

(vii) Refrain from availing itself of any business opportunity of interest to the Group.

#### **11. Professional development and training**

The Group promotes the personal and professional development of the professionals at its service, encouraging the improvement of their skills and abilities. All selection, recruitment, training and internal promotion actions are based on clear criteria of ability, competence and professional merit.

#### **12. Work-life balance**

The Group respects the personal and family lives of the professionals at its service, promoting work-life balance policies that allow the best possible balance between work and their personal commitments.

#### **13. Remuneration policy**

The Group is committed to offering its professionals fair remuneration that is appropriate to the labour market in which it operates.

#### **14. Commitment to health and safety**

**14.1.** The Group guarantees its professionals a healthy and safe working environment, requiring its companies to adopt all the measures and provisions reasonably necessary to maximize the prevention of risks at work.

**14.2.** Professionals must pay particular attention to occupational health and safety regulations in order to prevent and minimise occupational risks. All professionals will be responsible for the maintenance of their workplace, observing the applicable health and safety regulations and practices.

## **15. Right to privacy and data protection**

**15.1.** The Group respects the right to privacy of the professionals at its service, in all its forms, and undertakes not to disclose any of their personal data without their consent, except when required by law or by judicial or administrative measures.

**15.2.** All professionals who have access to the personal data of other professionals or third parties in the course of their work are required to keep this information confidential, complying at all times with applicable data protection laws and regulations.

**15.3.** The Group companies will also take the necessary measures from time to time to preserve the confidential nature of the personal data they may have and to ensure the confidentiality of their transfer, whenever this is necessary for commercial purposes, in accordance with applicable data protection laws.

## **16. Conflicts of interest**

**16.1.** The professionals act in the best defence of the Group's interests and detach themselves from any other external influence, avoiding conflicts of interest.

**16.2.** A conflict of interest is considered to exist when the private interests of professionals or their related parties interfere with their duties and responsibilities.

**16.3.** In these cases, professionals who find themselves in a conflict of interest in the performance of their duties refrain from making decisions and, in case of doubts about a possible conflict of interest, the person concerned informs his or her hierarchical superior who, if he or she deems it appropriate, submits the situation to the Audit and Control Committee for assessment.

**16.4.** the professional figures refrain from carrying out or participating in operations or activities that involve or may involve a conflict of interest, unless previously authorized in writing by the Audit and Control Committee. The trader in question will refrain from taking any action until the Commission has responded to his request.

## **17. Gifts**

**17.1.** Professionals refrain from giving or accepting gifts while performing their professional duties. Exceptionally, the delivery and acceptance of gifts will be permitted if (a) they have a symbolic value, (b) they are normal commercial gestures or gifts, (c) they are intended to promote the image of the Group and its products or, for gifts received from a Professional, the image or products of the person offering the gift, and (d) they are not prohibited by law or generally accepted commercial practices. In assessing whether gifts comply with accepted commercial practices, account is also taken of whether they are occasional or recurring.

**17.2.** Under no circumstances may cash gifts be given or accepted.

**17.3.** For the purposes of this Code, "gift" means any kind of attention, gesture, favor or compensation, in money or in kind, made, given or received by a professional figure.



**17.4.** Professionals must not give or accept gifts that could in any way be considered bribery or commission by or by any other party involved, such as public employees, employees of other companies, political parties, customers, suppliers, service providers or shareholders. Bribery, which is expressly prohibited, includes the direct or indirect offer or promise of any kind of improper benefit or advantage, or any instrument that conceals it, or influence peddling.

**17.5.** Professionals will not give or accept gifts or gifts that affect, or can influence, or can be interpreted as influencing the exercise of one's office or in the taking of decisions both by the person who makes them and by the person who receives them.

**17.6.** Each employee is responsible for knowing and properly evaluating local practices, taking into account the Group's interests and reputation. In any case, particular attention will be paid to avoiding gifts that could be interpreted as exceeding normal commercial practice or gestures of gift, or that could in any way be considered to correspond to the intention of the giver of the gift to obtain preferential treatment, or that are inappropriate for any other reason.

**17.7.** If, on the part of a professional figure, doubts arise about the appropriateness of a gift or a gift received or that he wishes to give, he must consult his superior. In the event that the superiors consulted according to the increasing hierarchical scale also have doubts, the matter will be examined until the Compliance Unit arrives, which will intervene definitively on the matter.

**17.8.** Any gifts received from professionals who do not comply with the Code will be returned or, if this is not possible, will be used according to the instructions of the Compliance Unit.

## **18. Confidential and confidential information**

**18.1.** The professionals will maintain absolute confidentiality and will treat confidentially all the information they become aware of during their professional activity

**18.2.** Confidential and confidential information will be subject to professional secrecy, without the content of the same being transmitted to third parties, except in cases of explicit authorization by the administrative body of the Group company within which the performance of the functions takes place or, ultimately, by the Audit and Control Committee, except for any requests from legislative, judicial or administrative authorities.

**18.3.** The Group and all the professionals at its service will use the means available to ensure security and will apply the necessary measures to protect confidential and confidential information recorded on physical or electronic media in order to deal with any internal or external risk of unauthorized access, manipulation or destruction, whether intentional or accidental. In this regard, the professional figures, in relations with third parties, will maintain confidentiality on the content of their work.

**18.4.** The disclosure of confidential information or its use for private purposes constitutes a violation of this Code.

**18.5.** Any reasonable indication of leakage of confidential and confidential information and of its use for its own purposes must be communicated by those who have knowledge to their superiors and/or, as the case may be, to the Audit and Control Committee. The immediate superior of the person making the communication must notify it, in turn, in writing to the aforementioned Revision Committee, through his Secretariat.

**18.6.** This obligation of confidentiality will be maintained even after the termination of the Professional's contract with any of the companies of the Group.

## **19. Inside information**

**19.1.** "Inside Information" means material information about the Group or its activities that is not in the public domain and which, if made public or made public, could affect the market or the share price of Ebro Foods.

**19.2.** Professional figures, even after having had access to any of the Group's inside information, must not disclose it to any third party unrelated to the transaction to which the inside information refers.

## **V. THE REPORTS OF THE EBRO FOODS GROUP**

### **20. Relations with shareholders**

**20.1.** The Group is committed to making not only the highest possible profit for the shareholders of Ebro Foods (the "**Shareholders**"), but also a long-term profit.

**20.2.** Ebro Foods is committed to providing Shareholders in a timely, fair and transparent manner with all information directly or indirectly concerning the development of the Group and its business. Consequently, it will inform them in advance through the official bodies and immediately afterwards through external agents, media and analysts.

**20.3.** Ebro Foods respects and protects the rights of minority shareholders by prohibiting any unfair or abusive use of inside or corresponding information.

Ebro Foods is committed to following generally accepted principles of Corporate Governance. Ebro Foods largely fulfils the Recommendations contained in the Unified Code of Good Governance adopted in Spain, giving notice of this in the Annual Corporate Governance Reports that Ebro Foods approves annually and which remain available to all interested parties, which can be consulted on the Ebro Foods corporate website.

### **21. Supplier Relations**

**21.1.** The Group promotes the assessment and selection of its suppliers on the basis of social, ethical and environmental criteria, in order to select those who, in addition to offering the best contractual conditions, share the principles and commitments described in this Code.

The Group will deal with suppliers of goods and services in an ethical and lawful manner. Behaviour aimed at obtaining preferential treatment will be avoided. No professional may receive gifts from suppliers or manufacturers of products consumed in the company, in the form of money, services or items, promotional or not, of high value, which reasonably exceed the usual rules of courtesy, as established in Rule 17 (paragraph IV of the

Code). Likewise, the professionals must not deliver gifts that may cause embarrassment to our suppliers or may be misinterpreted by third parties.

**21.2.** Prices and other information provided by suppliers are confidential and may not be used outside the Group unless previously authorised in writing.

**21.3.** In selecting its suppliers, the Group will evaluate those that (i) comply with applicable laws and regulations, (ii) respect internationally proclaimed human rights, and (iii) ensure that they do not violate or abuse human rights in the context of their business operations.

**21.4.** The professionals involved in the selection of suppliers must avoid any situation that could make them biased or affect their professional objectivity, declaring any conflicts of interest and refraining from participating in the relevant selection.

**21.5.** Where applicable, suppliers must ensure that the companies they subcontract work in accordance with the values, principles and standards contained in this Code and within the corresponding legal provisions.

**21.6.** In selecting suppliers, the Group assesses the candidates' promotion and compliance with the following principles:

- Abolish all forms of child labour.
- Eliminate all forms of forced and compulsory labor.
- Avoid discrimination in any job.
- Comply with the maximum working hours and minimum wages established by the national laws in force in the country in which they operate.
- Ensure that your employees are doing their jobs in compliance with occupational safety and hygiene standards.

**21.7.** The Group will also assess the commitment of potential suppliers to minimise the environmental impact of their activities and to promote the development and deployment of environmentally friendly technologies.

**21.8.** The Group will avoid maintaining relationships with suppliers who participate in any act of corruption, extortion or bribery that may violate compliance with generally accepted business rules and the principles of the Code.

**21.9.** The Group positively values suppliers who express their commitment to the principles promoted in this Code by accepting and respecting them.

## **22. Relations with consumers and customers**

**22.1.** The Group is committed to offering high-quality services and products according to the requirements and quality standards established by law and its own food safety and quality policy.

**22.2.** The Group is committed to achieving maximum transparency in all information exchanged with consumers and customers, in order to maintain a high degree of trust.

**22.3.** The Group guarantees the confidentiality of its customers' data, undertaking not to disclose them to third parties except in accordance with the laws in force or in compliance with judicial or administrative rules or orders. Customers' personal data will be obtained, used and processed in such a way as to ensure compliance with the personal data protection laws in force from time to time.

**22.4.** All professionals who, by virtue of their activity, have access to customer data, must keep this data confidential and comply with all applicable laws on the protection of personal data.

## **23. Relations with competitors**

**23.1.** The Group is committed to competing fairly in the markets in which it operates, promoting free competition, respecting the laws in force and avoiding any abusive behavior or restrictive practices.

**23.2.** The Group prohibits any action involving unfair competition and is committed to ensuring compliance with the fair trade laws applicable in the countries in which it operates.

**23.3.** The professional figures shall refrain from any unlawful use of the creations, works, distinctive signs or, in general, the intellectual and industrial property rights of competitors and third parties.

## **24. Environmental protection**

**24.1.** The Group declares its commitment to respecting and protecting the environment.

**24.2.** The Group implements adequate and reasonable tools in its companies to minimise the impact of its activities on the environment, with a view to reducing pollution, rational use of resources, minimising water, paper and energy consumption, reducing waste production and emissions, promoting recycling and seeking eco-efficiency.

**24.3.** The Group ensures that its companies comply with the environmental laws applicable to their operations and any additional commitments made voluntarily.

**24.4.** The Group also promotes the implementation of good environmental practices among its suppliers and customers.

## **25. Relations with society**

**25.1.** The Group carries out its activities in different geographical areas, thanks to which it contributes to the creation of employment and wealth and development of the communities in which it operates.

**25.2.** The Group is actively engaged in social action and collaborates, through the Ebro Foods Foundation, together with Non-Governmental Organizations, Foundations and Institutions, in the development of numerous programs, including the training and integration of people with disabilities, the aid of socially disadvantaged groups and the promotion of agricultural projects in the Third World.

## **26. Patronage and social activity**

**26.1.** In general, the Group's social activity is developed through the Ebro Foods Foundation. However, the Company and the companies of the Group may carry out social and advocacy activities, always within the scope of activities and/or entities that share the ethical principles expressed in the Code.

**26.2.** The social activity and sponsorships will be evaluated and approved on a case-by-case basis, by the corresponding corporate body, after evaluation of the proposal submitted by the promoter. Particular care must be taken not to link the image of the Group or its companies or products with activities or conduct that may be, for any reason, inappropriate.

**26.3.** In the evaluation of the proposals, however, it will be taken into account that activities and sponsorships must be in line with the principles contained in the Code. At the same time, the recipients of social activities and/or sponsors are expected to accept and recognize the principles contained in the Code as their own. In this regard, when deemed appropriate or in consideration of the circumstances of the case, the decision-making body may request an assessment and report by the Compliance Unit.

**26.4.** The approved activities or sponsorships must be subject to special monitoring to verify both that the activities carried out or sponsored are carried out within the framework of compliance with the principles of the Code, and, where necessary, that the funds or assets contributed by the Group to the specific activity or patronage are rightly placed.

The Group will take all measures that are necessary to ensure that the provisions of this article are observed in the social and advocacy activities carried out by the Ebro Foods Foundation.

## **27. Relations with authorities, regulatory bodies and administrations**

**27.1.** Relations with authorities, bodies, regulatory bodies and administrations will be based on the principle of maximum cooperation and transparency, without prejudice to the defence of the Group's legitimate interests.

**27.2.** The professionals will refrain from making donations to political parties, authorities, bodies, public administrations and institutions in general in the name or on behalf of the companies of the Ebro Foods Group or as professionals.

## **28. Adequate and truthful information**

**28.1.** Any falsification, manipulation or deliberate use of information constitutes a criminal offence. The Group adopts transparency of information as a principle, consisting in the commitment to communicate reliable information to the markets, whether financial, accounting or of any other nature. As a result, internal and external financial reporting provides a true and fair view of the real financial position and financial position in accordance with generally accepted accounting principles. The professionals must transmit the information in a truthful, complete and understandable form. Under no circumstances should you knowingly provide incorrect, inaccurate or inaccurate information.

**28.2.** Investor relations and financial analysts are channelled through Ebro Foods' investor relations unit.

**28.3.** Media relations are channelled through Ebro Foods' communications unit. No professional shall provide the media with information of any kind that may adversely affect the Group, its activities or the professionals employed by it, without prior knowledge or authorisation from the manager or the Board of Directors of Ebro Foods.

## **29. Fight against corruption, bribery, illegal commissions, bribery and money laundering**

**29.1.** The Group is committed to eradicating all forms of corruption within its companies, including extortion, crime and money laundering.

**29.2.** No professional figure will try to unduly influence the Public Administration or its officials, nor will they plan to obtain preferential treatment from any public administration or political party.

**29.3.** Any corrupt practice, giving of bribes or payment of commissions in any form, in actions or omissions, through the creation or maintenance of favourable or irregular situations, with the aim of obtaining any benefit for the Group, its companies or its professional figures, is prohibited.

**29.4.** The professionals undertake not to request, accept or offer any type of payment, in cash or otherwise, nor, in general, any type of benefit or advantage, of any nature, unjustified that favours the Group, its companies, or the same professional figure or third parties over others. In the same way, professionals will refrain from making payments or carrying out other illegitimate activities with the object of facilitating or speeding up a procedure or action against a judicial body, public administration or official body anywhere in the world.

**29.5.** In the choice of third parties with whom to sign the contracts, the legislation on money laundering will be taken into account and, depending on current circumstances, the possible existence of links between the candidate and inappropriate or illegal activities, with particular reference to money laundering and terrorist financing, will be verified.

**29.6.** The suspicion that third parties, already under contract, are carrying out illegal activities in any of these areas will be submitted to the scrutiny of the competent authority.

**29.7.** In commercial relations with suppliers and customers, payments made and received will be governed by the principle of maximum transparency and made by bank transfer. Other payment/collection instruments, such as cheques, may also be accepted, provided that they are issued in accordance with the provisions of applicable money laundering laws. Payments made and received in cash will be reduced to the bare minimum and must in any case be made in accordance with the statutory provisions in force from time to time.

## **VI. DISCLOSURE, ACCEPTANCE AND RESOLUTION OF INTERNAL CODE CONCERNS**

### **30. Dissemination and acceptance among professionals**

**30.1.** The various companies of the Ebro Foods Group will disseminate the contents of this Code among their professionals by:

- sending it to the e-mail address of the professional figure, when the latter has it.
- display of the Code on the bulletin board of each workplace.

**30.2.** In the same way, the human resources units of each company will hand over a copy to each employee, who in turn will sign a duly formalized letter of acknowledgment and acceptance of the Code, which is supplemented here as **Annex I**.

**30.3.** A copy of the Code will also be given to each of the future professionals at the time of their incorporation, in exchange for which the aforementioned letter of acknowledgment and acceptance of the Code will be received.

### **31. Answering questions**

**31.1.** The Ebro Foods Audit, Control and Sustainability Committee, supported by the Compliance Unit, will be the competent authority to supervise the implementation of the Code and resolve any interpretative doubts.

**31.2.** Each professional can send consultations, suggestions or questions regarding specific cases that may concern him, in any language, by contacting the Audit and Control Commission at the specific e-mail address [codigodeconducta@ebrofoods.es](mailto:codigodeconducta@ebrofoods.es)

**31.3.** The Audit and Control Committee, or the person delegated by it, will expressly resolve all concerns raised.

## **VII. CODE INFRINGEMENT REPORTING PROCEDURE AND CORPORATE WHISTLEBLOWING CHANNEL**

### **32. Whistleblowing channel**

**32.1.** All persons bound by this Code are obliged to comply with it and to ensure compliance with it.

**32.2.** No one, regardless of his or her position within the Group, is authorized to require a person bound by the Code to violate the contents of the Code. No relevant person can justify any negligence or conduct detrimental to the Code that states an order of a superior or ignorance of the contents of the Code.

**32.3.** In this sense, anyone bound by the Code may report, with a guarantee of absolute confidentiality and, in some cases, anonymously, any non-compliance or violation of any of the principles set out in this Code and, in general, any act that may be considered evidence of irregular activity. Affected persons who detect any of these situations shall report it through the appropriate channels and refrain from taking any individual action to resolve the incident.

**32.4.** To this end, a corporate reporting channel **has been set up** within the Ebro Foods Group's internal reporting system and can be accessed through the company's [website www.ebrofoods.es](http://www.ebrofoods.es).

**32.5.** Access to the Corporate Whistleblowing Channel is public and free of charge.

**32.6.** Upon receipt of a report, the System Administrator will decide, in accordance with Ebro Foods' Internal Whistleblowing System and Whistleblower Protection Policy, the appropriate Whistleblowing Procedure. The procedure determined will be in accordance with the applicable internal rules.

Both Ebro Foods' Internal Reporting System and Whistleblower Protection and Management Procedures Rules are published on the Company's website [www.ebrofoods.es](http://www.ebrofoods.es).

- All reports of violations of the Code of Conduct submitted through the Corporate Reporting Channel ensure the application of the principles set out in the Ebro Foods Internal Whistleblower Reporting and Protection System published on the Company's website [www.ebrofoods.es](http://www.ebrofoods.es).

## **VIII. EFFECTIVE DATE AND EXTERNAL DISTRIBUTION**

This Code of Conduct was approved by the Board of Directors of Ebro Foods, S.A. on November 25, 2015 and replaces and replaces the previous Code of Conduct, approved on March 28, 2012.

This Code is applicable to all companies of the Ebro Foods Group and to professional figures as of December 22, 2015.

The Code was amended by the Board of Directors on 27 September 2023 to adapt the provisions relating to the Corporate Reporting Channel to the Ebro Foods Group's Internal Reporting System.

The Board of Directors of Ebro Foods, S.A., through the Audit and Control Committee, will regularly assess the knowledge and effectiveness of this Code of Conduct and take the necessary measures, if necessary, in this regard.

The same was also published on the company website of Ebro Foods [www.ebrofoods.es](http://www.ebrofoods.es).

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**Annex I**  
**STATEMENT OF KNOWLEDGE AND ACCEPTANCE OF THE EBRO FOODS**  
**GROUP CODE OF CONDUCT**

Name and Surname:

Department:

Qualification:

Place of work:

Companies of the Ebro Group of which you are employed:

The undersigned declares that I have received and received a copy of the Code of Conduct of the Ebro Foods Group and that I acknowledge and accept it, undertaking to comply with its terms in the exercise of my professional functions.

Place and date

.....

Signature

.....