

CODE OF CONDUCT AND RESPONSIBLE PRACTICES OF CONGALSA

Code of Conduct and Responsible Practices of Congalsa

Contents	2
1. Definition and purpose of the Code of Conduct and Responsible Practices	3
2. Scope of application	4
3. General principles	4
4. General rules of conduct and responsible practices	5
4.1. Compliance with applicable legislation and internal regulations	5
4.2. Equal opportunities	5
4.3. Employee safety and health	6
4.4. Conduct of and towards employees	6
4.5. Customer relations	7
4.6. Market practices, image and competition	7
4.7. Supplier relations	8
4.8. Relations with public administrations	8
4.9. Prevention of corruption and bribery	9
4.10 Conflicts of interest	9
4.11 Use of company property and equipment	10
4.12 Confidentiality of information and Data Protection Law	10
4.13 Protection of intellectual and industrial property	12
4.14 Register of operations	12
4.15 Social commitment	13
4.16 Environmental commitment	13
4.17 Commitment to innovation	13
4.18 Responsible advertising commitment	14
5. Compliance with the Code of Conduct and Responsible Practices. Ethics Channel	14
6. Compliance Committee	15
7. Compliance with the Code of Conduct and Responsible Practices	17
8. Sanctions of the Code of Conduct and Responsible Practices	17
9. Update and interpretation	18
10. Validity and application	18

1. Definition and purpose of the Code of Conduct and Responsible Practices

The honesty, integrity and good judgement of employees, managers and partners is fundamental to the reputation and success of the company.

Within the framework of the standards of excellence, the principles of good governance, corporate responsibility and the culture of regulatory compliance, this Code of Conduct and Responsible Practices (hereinafter also referred to as the Code of Conduct or the Code) governs the actions and working relationships of Congalsa employees, managers and partners with customers and potential customers, colleagues, competitors, government bodies, the media and all other persons or institutions with which the company has contact, i.e. all its identified stakeholders. These stakeholder relations, and the fact that they meet the parameters desired by the company, are fundamental to Congalsa's continued success.

This Code of Conduct is intended to respond to the following needs of Congalsa:

- Demand the highest standards of honesty, integrity and ethical and responsible conduct, including appropriate and ethical procedures for dealing with actual or potential conflicts of interest between professional and personal relationships;
- Enforce compliance with applicable laws, rules and regulations, as well as the company's own internal rules and procedures;
- Address actual or potential conflicts of interest and provide guidance for employees, officers and partners to disclose such conflicts to Congalsa;
- Address misuse or misapplication of Congalsa's assets and business opportunities;
- Demand the highest level of confidentiality and fair treatment inside and outside Congalsa;
- Require immediate internal reporting of breaches of this Code of Conduct as well as appropriate reporting of any illegal conduct.

The aim of this Code of Conduct is to ensure professional, ethical and responsible behaviour by Congalsa and all its employees and collaborators in the performance of their activities, as a basic element of its corporate culture on which the training and personal and professional development of its employees is based. To this end, this Code defines how Congalsa's stakeholder relations should be governed emanating from the company's own Values:



Values

- Commitment to the company
- Respect for people
- External and internal customer focus
- Efficiency
- Integrity
- Team work
- Orientation towards continuous improvement
- Innovation
- Positive attitude
- Respect for the Environment

2. Scope of application

The Code of Conduct applies to and binds the management and administration and all Congalsa employees (for the purposes of this Code, Congalsa means any company, regardless of its form, in Spain or abroad, that is directly or indirectly controlled by Corporación Empresarial Congalsa, S.L.), regardless of the position and function performed; and regardless of the type of contractual relationship or agreement with the company.

The application of the Code, in whole or in part, may be extended to any natural and/or legal person related to Congalsa, when this is appropriate for the fulfilment of its purpose and is possible due to the nature of the relationship.

3. General principles

The Code of Conduct is defined as an ethical commitment that includes basic principles and standards for the proper development of relations between Congalsa and its main stakeholders, based on the following principles:

- All of Congalsa's transactions shall be conducted in an ethical and responsible manner.
- Compliance with current legislation, internal regulations and procedures established by the Company is a necessary prerequisite for this Code.
- The behaviour of Congalsa's employees shall conform to the spirit and wording of this Code of Conduct.
- All natural and legal persons who directly or indirectly maintain any labour,



economic, social and/or industrial relationship with Congalsa shall be treated fairly and with dignity, shall be informed of our ethical and behavioural principles, and shall be required to abide by them.

- All of Congalsa's activities shall be carried on in the most environmentally friendly way possible, favouring the conservation of biodiversity and the sustainable management of natural resources.

4. General rules of conduct and responsible practices

4.1. Compliance with applicable legislation and internal regulations

Compliance with existing regulations is a necessary precondition for this Code.

The application of the Code shall in no case imply non-compliance with the legal provisions affecting the company.

All of Congalsa's employees, managers and members shall comply with the company's rules and procedures, as well as internal technical instructions arising from certifications or any internal operating rules.

In all cases. Congalsa shall respect Human Rights and the principles of the International Labour Organisation in the development of its activities and the treatment of its employees.

4.2. Equal opportunities

Congalsa's Human Resources Policy contains a commitment, in line with legislation and Universal Declarations of Human and Labour Rights, to equal and non-discriminatory treatment on the grounds of race, colour, sex, religion, political opinion, nationality, social origin, ancestry, disability, age, marital status, sexual orientation or any other condition in all its selection, training, remuneration and promotion processes.

The company's Equality Plan also delves deeper into these aspects with various actions to achieve work/life balance, together with the Social Improvements that aim to improve the quality of life of workers and their families.

4.3. Employee safety and health

Congalsa considers people as a key business factor, defends and promotes compliance with human and labour rights and is committed to the application of regulations and good practices in terms of employment conditions, health and safety in



the workplace.

The company is audited annually in accordance with the OHSAS 18001 Occupational Health and Safety Assessment Series, with plans to adapt to ISO 45001 within the regulatory deadline.

Company employees shall cooperate in strict compliance with applicable labour standards and in the prevention, detection and eradication of irregularities in this area. All employees are responsible for strictly complying with occupational health and safety standards, and for ensuring their own safety and the safety of those affected by their activities.

The use of substances that could affect the proper performance of professional duties is prohibited.

4.4. Conduct of and towards employees

For the performance of their daily activities, Congalsa's employees have, in addition to their knowledge, comprehensive corporate documentation at their disposal with guidelines, communication mechanisms and action procedures for different circumstances.

None of Congalsa's employees shall be discriminated on the grounds of race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality or gender.

Congalsa treats its employees with respect, dignity, and does not allow any manifestation and/or practice of abuse of power, authority and harassment of any kind within the Company as set out in the Company's Harassment Protocol.

Congalsa's employees have the right to organise, freedom of association and collective bargaining.

The salary received by Congalsa's employees is commensurate with the function discharged, always in accordance with the collective bargaining agreement.

All of Congalsa's employees work in safe and healthy workplaces.

All of Congalsa's employees have access to company-paid training that contributes to their personal and professional development, and which will be mandatory in the cases indicated by the organisation.

Immediate family members and partners of employees may be hired as employees or consultants only if their employment is based on their qualifications, performance, skills and experience, and provided that there is no direct or indirect employment relationship between the employee and his or her family member or partner. These principles of fair recruitment shall apply to all aspects of the employment relationship, including remuneration, promotions and transfers, even if the relationship develops after the



respective employee has joined the Company.

4.5. Customer relations

Congalsa protects its customers by establishing and implementing mandatory standards for all suppliers in terms of product health and safety, guaranteeing that all the products it markets do not involve risks to their health and/or safety in their consumption.

Congalsa's employees shall ensure that the above standards are met, as well as all other established rules and procedures concerning product labelling, quality and characteristics.

Congalsa is based on the principles of excellence and continuous improvement of its processes and products; it also maintains open channels with its customers to satisfy their demands and receive feedback through the satisfaction surveys it carries out.

4.6. Market practices, image and competition

Congalsa competes in the market in a fair manner and under no circumstances tolerates misleading, fraudulent or malicious conduct.

The search for commercial or market information by Congalsa's employees shall always be carried out without infringing the regulations that may protect it.

All of Congalsa's employees and/or collaborators shall be responsible for the good image and reputation of the Company.

Employees shall reject competitor information obtained inappropriately or in breach of the confidentiality under which it is held by its rightful owners.

Company employees shall also avoid spreading malicious or false information about the company's competitors.

4.7. Supplier relations

We expect our suppliers to meet the same standards of integrity that we uphold. Supplier relations must be ethical, since an unethical or illegal act by a supplier can damage Congalsa's reputation as a company and cause a loss of respect for our goodwill in the communities we serve. Therefore, all suppliers must comply with our Code of Conduct and Responsible Practices as a condition for doing business with us. Our suppliers include any third parties, such as consultants, contractors, service providers or suppliers of raw materials, ingredients or packaging components, etc.

If you are responsible for selecting a supplier, you should base your decision on merit, service quality/price ratio, environmental impact of their activities, compliance with labour and OHS legislation and reputation, understood as mutual respect between



supplier and customer.

The principle of transparency and the pursuit of a stable business relationship must determine the choice and also comply with Congalsa's internal procurement procedures.

4.8. Relations with public administrations

Those Congalsa employees who interact with public authorities and institutions where the Company carries out its activities, shall do so in a lawful, ethical, respectful manner and aligned with the legal provisions and internal policies for the prevention of corruption and bribery. Those employees who have a relationship with representatives of public administrations must be specifically authorised by the company.

In any case, compliance with current legislation, transparency, collaboration with public administrations and, above all, following the principles of coherent personal conduct established in this document must be ensured.

Congalsa's employees shall refrain from making facilitation or expediting payments, consisting of the delivery of money or other things of value, whatever the amount, in exchange for securing or expediting the course of a procedure or action of whatever nature, before any judicial body, public administration or official body.

4.9. Prevention of corruption and bribery

Congalsa's transparency principles include the obligation of management and all employees to prohibit any unethical practices, therefore: It is forbidden to request or accept any kind of payment, commission, gift or remuneration for transactions carried out by Congalsa, or to otherwise take advantage of the position held in the Company for personal gain.

No employee may request or accept any type of payment, commission, gift or remuneration in relation to their professional activity at Congalsa from customers, suppliers, intermediaries or any other third party. This limitation does not include:

- a) Promotional items of low value.
- b) Normal invitations which do not exceed the limits considered reasonable in customary, social and polite usage.
- c) Occasional presents for specific and exceptional reasons (such as Christmas or wedding gifts), provided that it is not in cash and is within reasonable and modest limits.

All of Congalsa's employees, without exception, shall comply with the internal regulations in force at any given time regarding anti-corruption and bribery policies.



4.10. Conflicts of interest

All members of Congalsa shall avoid situations that may involve a conflict between their personal interests and those of the company. They shall also refrain from representing the company and from intervening in or influencing those decisions in which, directly or indirectly, they or a third party connected with them have a personal interest. They may not use their position in the company to obtain personal or financial advantage or business opportunities of their own.

No Congalsa employee may provide services as a consultant, director, officer, employee or advisor to any competing company, except for services that may be provided at Congalsa's request or with Congalsa's authorisation.

Congalsa's employees may only carry out work and professional activities unrelated to those carried out at Congalsa when they do not entail a reduction in the efficiency expected in the performance of their duties. Any outside work or professional activity that may affect the company's working day must be authorised in advance by Congalsa.

Employees shall be entitled to participate in legally recognised political activities, provided that they are not linked to Congalsa or affect its image, do not interfere with the proper performance of their activity in the Company and are carried out outside working hours and any Company facilities in such a way that they cannot be attributed to the Company.

4.11. Use of company property and equipment

Congalsa's employees shall use the Company's goods and services efficiently and will not use them for personal gain.

In this respect, Congalsa employees shall under no circumstances make use of the equipment that Congalsa places at their disposal to install or download programmes, applications or contents whose use is illegal, which contravene the company's rules or which may damage its reputation. Congalsa's electronic equipment (software, hardware, telephones, tablets or laptops, etc.) are for the exclusive use of the Company and are not to any extent suitable for private use.

Nor shall they use Company funds or cards to pay for activities that are not part of their professional activity.

Employees must be aware that the documents and data contained in Congalsa's information technology systems and equipment may be subject to review by the competent Company units, or by third parties designated by the Company, when deemed necessary and permitted by the regulations in force.

In addition to the rules set out in the Welcome Handbook, the specific rules governing



the use of electronic mail (Policy on the Use of Electronic Mail), access to the Internet or other similar means made available to them must be respected, and under no circumstances shall these be used inappropriately. The creation, membership, participation or collaboration of Company employees in social networks, forums or blogs on the Internet and the opinions or statements made therein shall be made in such a way that their personal nature is clear. In all case, they must refrain from using Congalsa's image, name or trademarks to open accounts or register in these forums and networks without the express authorisation of the Company.

4.12. Confidentiality of information and Data Protection Law

All Congalsa employees sign the Data Protection Clause on joining Congalsa, which sets out their obligations.

Congalsa's employees have an obligation to protect the information and knowledge generated within the organisation, owned or held by them.

Employees shall refrain from using any data, information or documents obtained in the course of their professional activity for their own benefit. Nor shall they communicate information of any kind concerning the Company or its products or processes to third parties, except in compliance with applicable regulations, company rules or when expressly authorised to do so.

Congalsa's employees undertake to maintain confidentiality and to use any data, information or document obtained during the exercise of their responsibilities in the company in accordance with the internal regulations on the matter.

In general, unless otherwise instructed, the information to which they have access shall be treated as confidential and may only be used for the purpose for which it was obtained. For such purpose, Congalsa classifies all internal Company information as a trade secret and protects it appropriately, and the Trade Secrets Act applies to all of it.

Furthermore, they shall not duplicate, reproduce or make any use of the information other than that required for the performance of their tasks and shall not store it in information systems not owned by Congalsa, except in the cases and for the expressly authorised purposes.

The obligation of confidentiality shall survive the termination of employment with Congalsa and shall include the obligation to return any Company-related material in the employee's possession at the time of termination of his or her relationship therewith.

Congalsa's personnel shall respect the personal and family privacy of all persons, whether employees or others, to whose data they have access. Authorisations to use data shall be in response to specific and justified requests.

Congalsa's employees shall strictly comply with the internal and external rules established to ensure the proper treatment of information and data provided to the



Company by third parties.

In the collection of personal data from customers, employees, contractors or any person or entity with whom a contractual or other relationship exists, all of Congalsa's personnel obtains consents, where required, and undertake to use the data in accordance with the purpose authorised by the consenting party.

Furthermore, Congalsa's employees must know and respect all the internal procedures implemented with respect to the storage, custody and access to data and which are intended to guarantee the different levels of security required according to the nature of the data.

Employees shall report to the relevant department or area any incident they detect related to the confidentiality of information or the protection of personal data.

4.13. Protection of intellectual and industrial property

Congalsa is committed to the protection of its own and others' intellectual and industrial property.

Congalsa's employees shall respect the intellectual property and the right of use corresponding to the company in relation to courses, projects, programmes and computer systems; equipment, manuals and videos; knowledge, processes, technology, know-how and, in general, other works and works developed or created in Congalsa, whether as a result of its activity or as a result of contracting or alliance with third parties.

Congalsa's employees shall not make unauthorised use of Congalsa's image, name or trademarks except for the proper performance of their professional activity within the company; this includes, among others, patents, trademarks, design rights, database extraction rights and rights to technical know-how, while respecting the confidentiality of trade secrets.

The intellectual and industrial property resulting from the work of employees during their stay in the Company, and which is related to the present and future business of Congalsa, shall be the property of the Company.

4.14. Register of operations

All material transactions carried out by the company shall be clearly and accurately recorded in proper accounting records which give a true and fair view of the transactions and shall be available to internal and external auditors.

Congalsa's employees shall enter financial information into the company's systems in a complete, clear and accurate manner, so as to reflect, on the corresponding date, their rights and obligations in accordance with the applicable regulations.



In addition, it will ensure the rigour and integrity of the financial information that, in accordance with the regulations in force, must be disclosed.

The accounting records shall be available to internal and external auditors at all times. To this end, Congalsa undertakes to provide its employees with the training necessary for them to know, understand and comply with the commitments established by the Company in the area of internal control of financial information.

4.15. Social commitment

Congalsa's social commitment takes the form of sponsorship, patronage and social action activities, carried out by the organisation or channelled through collaboration with social organisations.

The Institutional Relations Department, with the approval of the Compliance Committee, in accordance with its internal regulations on donations, sponsorships, etc., is the body authorised to approve any contribution for sponsorship, patronage or social investment programmes.

4.16. Environmental commitment

Congalsa's environmental commitment is embodied and ratified in the annual audits of its Environmental Management System through the ISO 14001 and EMAS Regulation certifications; in both certifications it works with specific environmental management objectives, recycling and promoting the preservation of the environment, assuming an explicit commitment to strategies against climate change.

All of the Company's employees or collaborators shall take measures to preserve the environment in the context of their work habits with the aim of achieving the objectives set by the Company: reduction of energy consumption, reduction of paper, toner, containers, packaging, etc.

Congalsa is committed to minimising the environmental impact of its products' packaging throughout the entire life cycle, from design, manufacture, distribution, sale and end of life, by developing measures to reduce and compensate for this impact at each stage of the design, manufacture, distribution, sale and end of life process.

Congalsa's employees carry on their activities by promoting the social and environmental sustainability of the company, as a way of responsibly creating value for all its stakeholders.

4.17. Commitment to innovation

Innovation forms part of Congalsa's DNA, which considers it an essential attitude for



the Company's survival and for increasing its competitiveness; therefore, the Company will endeavour to gather the improvements suggested by its employees and study their implementation.

The company has an R&D Department and a Continuous Improvement system that will be in charge of testing all the improvements and their practical application in the company.

4.18. Responsible Advertising commitment

Congalsa establishes, for the dissemination of its policy and actions in matters of Corporate Social Responsibility, "responsible advertising" conceived in accordance with the basic principles contained in the deontological rules of the Code of Advertising Conduct approved on 19 December 1996 and its subsequent amendments, of the Association for the Self-Regulation of Commercial Communication (Autocontrol) and with the current regulations governing advertising in Spain.

5. Compliance with the Code of Conduct and Responsible Practices. Ethics Channel.

The guarantor of compliance with this Code of Conduct shall be the Compliance Committee, which may act on its own initiative or at the request of any Congalsa employee, by means of a bona fide complaint.

This document grants appointment status to the three aforementioned positions as ex officio members of the Compliance Committee.

Compliance with this Code of Conduct shall be mandatory from the time of its approval and entry into force, and all members of the Organisation shall report to the Compliance Committee and through the Ethics Channel any possible breach or non-compliance with the Code of Conduct of which they may become aware.

To this end, communications made under this Code may be sent to the Compliance Committee through the ethics and whistleblowing channel created for this purpose, which shall be sent by email to the following address:

- **congalsa@canaletico.online**

The Compliance Committee reports to the Company's Board of Directors and has the following **basic functions**:

- a) The supervision of the internal dissemination of the Code of Conduct among all of Congalsa's employees and due compliance therewith.
- b) Control and supervision of the processing of files and their resolution.
- c) The interpretation of discrepancies arising from the application of the Code of Conduct when raised by the Ethics Committee.



- d) The supervision of the Ethics Channel and of compliance with its investigation procedure and application, where appropriate, of the disciplinary regime.
- e) Regular submission of information to the Governing Body on the functioning and incidents of the Ethics Channel, procedures processed, sanctions imposed, etc.

In the exercise of its functions, the Compliance Committee shall **guarantee**:

- a) The confidentiality of the complainant and of the complaints made, in relation to all the data and background information handled and in relation to the actions carried out, unless the law or court order requires the submission of information.
- b) The exhaustive analysis of any data, information or documents on the basis of which its action is promoted.
- c) The institution of proceedings appropriate to the circumstances of the case, in which they will always act independently and with full respect for the right to a hearing and the presumption of innocence of any person concerned.
- d) The indemnity of any complainant as a result of the submission of bona fide complaints to the Committee.

The Compliance Committee shall have the necessary means to ensure the implementation of this Code of Conduct.

The decisions of the Compliance Committee shall be binding on Congalsa and the employee.

The Compliance Committee shall report to the Management Body.

6. Compliance Committee

A Supervisory and Control Body is created to ensure compliance with the criminal risk prevention programme that the organisation has approved the implementation of: the Compliance Committee.

Said Congalsa internal body shall be appointed by the administrative body, which shall provide it with the necessary resources and independence to discharge its functions.

The *Compliance Committee* shall consist of the following members: RII Director, Controller, and an external lawyer with expertise in Compliance and recognised experience in the field, who shall submit regular reports to the management body and report on compliance with the criminal risk prevention programme and also supervise



compliance with this Code of Conduct.

The functions entrusted to this body, in addition to those expressed in the previous section, are as follows:

- Supervision, together with the Ethics Committee, of the appropriate dissemination, publicity and compliance with the Code of Conduct.

- Supervision of the Ethics Committee's promotion of sufficient training activities to ensure compliance and respect for this Code by all members of the organisation.

- Preparation of a criminal risk map and proposal (and, if necessary, implementation) of appropriate measures and controls for the continuous improvement of the criminal risk prevention programme.

- Receipt of complaints in general, and in particular on breaches of the Code of Conduct, and processing of the corresponding procedure for the investigation of facts and institution and proposal of sanctions.

- Resolution of doubts raised by the Ethics Committee on the application of this Code of Conduct.



- Regular reporting on compliance with the Code of Conduct (following a report by the Ethics Committee) to the Governing Body and preparation of a detailed annual report on compliance with this Code, incidents, sanctions, etc.

- Proposal to update the Code of Conduct in accordance with new regulations or needs that become apparent in the course of its implementation.

- Proposition of internal policies and regulations aimed at preventing non-compliance with regulations within the organisation.

- Approval of its internal operating regulations and the Criminal Risk Prevention Manual.

- Design and implementation of compliance training policies.

7. Publicising the Code of Conduct

The Code of Conduct shall be circulated to all employees, who shall acknowledge receipt of the Code of Conduct. It shall also be posted on notice boards and published on the Company's intranet, and shall be the subject of appropriate communication, training and awareness-raising actions by the heads of each department, so that it is properly understood and put into practice throughout the organisation.

New hires shall also be provided with a copy in physical or digital format, of which they



shall acknowledge receipt.

Likewise, all stakeholders shall have access to a copy of the contents of this Code of Conduct and Responsible Practices of Congalsa, endeavouring, insofar as possible, to ensure that any third party that has dealings with the company complies with its provisions.

8. Sanctions of the Code of Conduct

The behaviour of Congalsa's employees is understood to be governed by the aforementioned principles of conduct (in their interaction with identified stakeholders) and by the internal regulations established for the performance of their tasks.

The obligation of compliance is expressly understood to apply to all employees hired by Congalsa and to the organisation's senior management, since once it has been disclosed internally, no one can claim ignorance for non-compliance. Furthermore, compliance with the Code of Conduct shall also be obligatory for third parties who have dealings with Congalsa and have agreed to accept and comply therewith.

In the event of non-compliance with this Code of Conduct, the Company's management, subject to the corresponding procedure by the Ethics Committee in accordance with the operating rules of the Ethics Channel, will take the appropriate sanction actions and their graduation provided for in the Collective Bargaining Agreement.

In the event of committing infringements, the employees of the organisation, regardless of their position or responsibility, shall be subject to the disciplinary regime established in the Workers' Statute and Collective Bargaining Agreements that may apply.

9. Update and interpretation

The Ethics Committee and the Compliance Committee shall regularly review this Code of Conduct in accordance with the incidents detected and/or requests and needs presented by Stakeholders, as well as due to regulatory updates (both legal and internal regulations). Revisions to the Code of Conduct must be approved by Congalsa's management.

10. Validity and application

This updated version of the Code of Conduct, applicable to all of Congalsa's employees, shall become effective on 13/12/2019 and is adapted to the decision to implement the criminal risk prevention programme adopted by the Company's management.

This Code of Conduct will be reviewed periodically once a year by the Compliance



Committee.

