



Costa Brava

MEDITERRANEAN FOODS

September 2020



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1.- OBJECTIVE

This Code of Ethics and Conduct aims to base the conduct and actions of the members of COSTA BRAVA MEDITERRANEAN FOODS - GRUP CAÑIGUERAL (hereinafter "the Group", "the Holding" or "the Company") on respect for fundamental values such as **honesty, integrity, transparency and safety**; all of which must be subject to high levels of monitoring and ethical behaviour, as well as respect for fundamental rights and personal and professional dignity.

The principles of action and values of the Company, based on a socially and environmentally responsible commitment, are the basis of the success and prestige of Grup Cañigueral, a holding company of family origin and vocation with more than 50 years of experience, which makes its inherited values its own: the passion for a job well done and ethical behaviour.

By basing Grup Cañigueral's actions on these values, it has gained the trust of stakeholders and society in general, becoming a global international holding company that seeks the well-being of people and a better collective future.

This Code is a basic and essential element that guides the external and internal actions of Grup Cañigueral, as a way of guaranteeing that all its activities are carried out with the maximum integrity, as well as with the necessary supervision for the fulfilment of the assigned objective.

Therefore, the ultimate aim of this Code of Ethics and Conduct is to establish the values that should guide the behaviour of all the directors, managers, employees and collaborators of Grup Cañigueral, as well as to promote honest business conduct that results in an image of transparency that is valued both by the members of the organisation and by third parties (suppliers, customers, collaborators, etc.).

The provisions of this Code establish the Group's bases for action and constitute the formal and institutional reference for all its members, reducing subjectivities and personal interpretations of moral and ethical principles to a minimum. The purpose of the Code is, among other things, to respond the principles of competitiveness, profitability and social responsibility, the latter including, due to its special importance, health, the environment, safety and the treatment of the Company's customers, suppliers and collaborators.

2.- SCOPE OF THE CODE

This Code of Ethics and Conduct shall apply to and oblige the following persons to strictly comply with and enforce this Code of Ethics and Conduct:

1. Shareholders and Owners:

While exercising their property rights, they must ensure:

- Guide the Group towards economic dynamism with ethics and responsibility;
- Promote fair compensation to people for their work;
- Appoint qualified, experienced and ethical managers; and,
- Uphold the company's values in line with its Code of Ethics.

2. Administrators and Directors:

When exercising their managerial functions, they must ensure that they:

- Carry out their activities professionally, ethically and responsibly.
- Make known, comply with and enforce compliance with the Code of Ethics.
- Promptly and accurately inform ownership of the business situation.
- Subordinate their own interests to those of the Group when representing it.
- Maintain the confidentiality of what they know by reason of their position.
- Maintain a succession plan in force.

In their relations with suppliers and customers, they must ensure that:

- Choose partners in accordance with the Group's ethical principles.
- Be fair with suppliers and encourage long-term relationships.
- Offer transparency and equal opportunities to suppliers.
- Seek product excellence for consumers.
- Deal promptly and efficiently with consumer complaints.

In relation to the competence, they must ensure:

- Do not abuse a dominant or privileged position in the market.
- Compete fairly by refraining from unfair practices.

In relation to employed persons they must:

- Treat them with respect and fairness, considering their cultural sensitivity.
- Do not discriminate based on race, religion, age, nationality or gender.
- Do not consider personal conditions other than merit and ability.
- Not allow any form of violence, harassment or abuse at work.
- Recognise the right of association, unionisation and collective bargaining.
- Not tolerate retaliation or hostile action for engaging in union activity.
- Encourage the development, training and promotion of individuals.
- Promote fair pay.
- Remuneration and promotion should be linked to merit and ability.
- Define and communicate clear rules for hiring and separation.



- Ensure health and safety at work.
- Adopt reasonable measures to maximise risk prevention.
- Reconcile work and family life of the employee.
- Facilitate participation in the Group's social action programmes.
- Seek the integration of disabled or handicapped people in the workplace, removing barriers to their integration.

In relation to civil society, they should ensure:

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- Promote human rights and respect democratic institutions.
- Maintain political neutrality as a sign of respect for different opinions as long as these do not interfere with professional activity.
- To deal with public authorities and institutions in a lawful manner without accepting or offering gifts or commissions.
- Avoid donations to political parties and, if they are made to institutions, only in a transparent manner and in accordance with current legislation.
- Collaborate with the administration and NGOs in favour of the most disadvantaged.
- Oversee compliance with this Code.

3. Team leaders

People who are entrusted with the mission of managing teams must:

- Lead by example and become a role model.
- Create a working environment that listens and answers.
- Ensure that no one who reports breaches in good faith suffers retaliation.
- Ensure that any violations or non-compliance are properly managed.
- Be proactive and seek the best opportunities for their teams.
- Maintain confidentiality of information known to them because of their position.
- Ensure that their team knows, understands and complies with this code.



4. Responsibilities of employees

All members of Grup Cañigueral must fully assume their responsibilities:

- Act in a professional and ethical manner in accordance with the Group's standards.
- Know/comply with the Code and internal procedures that apply to you.
- Report any non-compliance to your manager or the Ethics Channel.
- Cooperate in investigations: Do not destroy or falsify data.
- Help the supplier understand the practical applications of the Code.
- Ensure that pressure does not lead to non-compliance with the law.
- Maintain confidentiality of sensitive information.
- Protect the Group against misuse, abuse or sabotage (Food Defence).
- Work efficiently throughout the working day, making the best use of time and resources.

The application of this Code of Conduct may be extended to any natural or legal person with whom Grup Cañigueral enters into a relationship, whatever its nature, as long as it is necessary for the fulfilment of its purpose.

3.- VALUES

Grup Cañigueral attaches equal importance to the results obtained, as well as to the way in which they are obtained. The Group's main objective is to achieve **EXCELLENCE** in the products it offers to its customers, constantly innovating and guaranteeing quality, safety and respect for the environment.

This objective can only be achieved with the **COMMITMENT** of all the members of Grup Cañigueral with their third parties and their enthusiasm in carrying out their work, improving their **EFFICIENCY** every day to guarantee their future and the future of their suppliers and customers.

All this would not be possible without the **RESPECT** that the company promotes and encourages, not only among its members, but also with anyone with whom it enters any kind of relationship, as well as guiding its professional activity towards the achievement of the objective of **ANIMAL WELFARE**.

The intention of Grup Cañigueral is to continue being a **RESPONSIBLE** company, recognised for knowing how to listen to the expectations and needs of its clients and incorporate them into the approach of each of its actions.

In addition to the above, the Group subscribes to the UN Universal Declaration of Human Rights, the recognition of the inherent dignity and the equal and inalienable rights of the human family. The Society also subscribes to the Sustainable Development Goals (SDGs) and their call to eradicate poverty, protect the planet and ensure universal peace and prosperity.



4.- THE 12 CORE PRINCIPLES

4.1.- Gaining the trust of our customers

Grup Cañigueral markets and makes available to its customers products of food safety, quality and warmth, with homogeneity, and following the strictest manufacturing standards.

The aim of Grup Cañigueral is to act with transparency to resolve any case of risk, based on honesty and providing customers with truthful, clear and useful information on labelling and marketing.

The Company is also at the disposal of customers to deal with any **complaints, claims or concerns** they may have at any time.

In line with the above, Grup Cañigueral, in all actions aimed at marketing and promoting its products, assumes the obligation to inform of the characteristics and qualities of its products with the utmost diligence and in an ethical manner, checking at all times that this information is up to date, truthful, clear, precise and sufficiently complete so as not to mislead consumers in any way.

In addition, the Group will check that its products comply with all the specifications advertised and required by current legislation.

4.2.- Fighting bribery and corruption

Grup Cañigueral is opposed to all forms of corruption and influencing the will of people outside the Company to obtain any kind of unjustified benefit through the use of illicit or unethical practices. For this reason, all the parties listed in article 2 "Scope of application" must act in accordance with the applicable laws and, under no circumstances, may they resort to or tolerate bribes from or towards third parties.

In relation to the above, Grup Cañigueral prohibits **receiving, requesting, accepting, promising, offering or granting benefits or unjustified advantages, gifts or any other contribution to/from third parties, directly or indirectly**, whatever their nature, whether they are private individuals, public officials or authorities, **with the intention of unlawfully obtaining or maintaining business or other advantages.**

Facilitation, unofficial and improper, payments for the purpose of obtaining or expediting an action or service are also **prohibited**.

It is important to remember that this type of conduct may result in criminal penalties for the natural person who carries it out, as well as the imposition of high and substantial financial penalties on Grup Cañigueral.

In addition to what has been said so far, the actions referred to above not only entail the sanctions mentioned in the previous paragraph, but also entail the risk of exposing Grup Cañigueral to serious reputational damage and even commercial losses; note that the image of a company involved in corruption would dissuade other market operators from entering a contractual relationship with the company.



For all these reasons, Grup Cañigueral has an Anti-Corruption Policy which sets out the conduct prohibited by the members of the Company and the action guidelines in the case of a situation that is contrary to good practice.

4.3.- Avoiding conflicts of interest

Any member of Grup Cañigueral may find themselves in a situation in which there is a risk that their personal interests may conflict with the interests of the Company. Personal interests must be interpreted in a broad sense; they include not only the interests of the employee, but also of those close to him or her (whether other people or companies). To avoid the existence of such conflicts, the Company must guard against situations in which the objectivity of its members' decisions may be impaired.

To this end, the Group establishes controls to **prevent any person with a financial, family or friendship interest in a supplier or aspiring supplier from being involved in a decision-making process associated with that supplier.**

In this context, when the personal interests of a member of the company interfere with corporate decision-making, he or she must remain on the sidelines: if in doubt, the line manager must be consulted. On the other hand, if, as a result of the professional activity of the members of the Company, they become aware of a business opportunity, this corresponds, in the first instance, to the Group.

Finally, if a member of the Company combines his or her work with another business activity and this may affect work performance, he or she must inform his or her superior immediately.

4.4.- Non-discrimination and equal opportunities

Grup Cañigueral promotes the professional and personal development of its members, ensuring equal opportunities through its action policies and promoting the equality of people regardless of their race, sex, nationality, ideology, sexual orientation, etc. Likewise, it promotes the right to training, promotion and professional and personal development equally for all members, ensuring equal opportunities.

In relation to the above, all members of the Company have the right and duty to actively participate in the training plans that Grup Cañigueral makes available to them, involving themselves in their own development and undertaking to keep the knowledge and skills necessary for the most effective performance of the responsibilities entrusted to them up to date, with the aim of promoting their professional progress and contributing value to its members and to the Company.

Likewise, the selection and promotion of members of the Company is based on the principles of merit, ability and suitability of personal skills for the effective performance of the duties and responsibilities of



the corresponding job. In any case, the established procedures (both legal and internal) shall be followed for the hiring of personnel and the termination of employment agreements.

Finally, it should be pointed out that persons holding management or leadership positions should act as facilitators of the professional development of the members of the Company and, in particular, of their team members.

4.5.- Respect for people and their privacy. Zero tolerance for harassment

Grup Cañigueral aims to motivate all its members, facilitating their daily work and retaining talent by creating a competitive, healthy and safe working environment.

For this reason, the Group rejects any manifestation of physical, psychological or moral harassment or abuse of authority, as well as harassment at work (commonly known as mobbing) and any other conduct that may generate an intimidating environment, harmful or detrimental to the rights of individuals.

To point out that, in relations between members of the Group - regardless of their position or hierarchical position - as well as between them and any person (natural or legal) with whom the Company collaborates or maintains commercial relations, respectful, professional and friendly treatment must prevail, with the aim of fostering a pleasant, gratifying and safe working environment.

Likewise, Grup Cañigueral will not tolerate unwanted or annoying conduct by any employee that harasses another person, disrupts their work or causes intimidation. This includes the excessive use of profanity or any form of humiliation or aggression.

Sexual harassment is considered offensive actions such as requests for dates or sexual favours as a condition of employment. And when an intimidating, offensive or hostile work environment is created by sexual advances, abusive jokes or any other verbal or physical behaviour of a sexual nature.

For these reasons, the company has a Sexual Harassment Protocol.

4.6.- Respect for free competition

At Grup Cañigueral we respect free competition and reject inappropriate practices that limit it. **We do not seek competitive advantages through unethical or illegal procedures.** In this context, sharing sensitive information with a competitor or trying to gain a competitor's information by hiring personnel should be avoided.

Finally, trading in commercial securities (by oneself or through an intermediary) on the basis of material information that is not in the public domain is prohibited by law.



4.7.- Defending global trade and preventing money laundering

Grup Cañigueral is dedicated to the commercialisation of its products, both nationally and internationally, in the development of its professional activity, as well as the carrying out of different economic transactions consisting of the acquisition of goods with the aim of fulfilling its mission.

In this sense, Grup Cañigueral is committed **to respect the market, trade, import and export legislation of all the countries in which the Group operates and markets its products.**

For this reason, Grup Cañigueral rejects any activity related to, or with indications of the appearance of, conduct typified as crimes of Money Laundering (mechanisms to give the appearance of legitimacy to assets of criminal origin) or Financing of Terrorism.

4.8.- Corporate image and reputation

Grup Cañigueral considers its corporate image and reputation as one of its most valuable assets in order to preserve the trust of its members and third parties (suppliers, customers, collaborators, etc.).

The Group must therefore have a single voice in the information it provides to the public. Only authorised persons should speak on its behalf and **any communication with journalists on company matters should be channelled to the Communications Department.**

The image and reputation of Grup Cañigueral also includes the use of social networks by its members, both professionally and personally. Only authorised members of the Company may publish on corporate social networks and all communication must be responsible and respectful of third parties, as well as always express the opinion of the Company.

On the other hand, members of the Group who use or are active on social networks with their personal profile must bear in mind that any comment or action may be directly attributed to the company and may negatively affect its image and reputation, so they are required to be responsible and serious in their use.

For this reason, Grup Cañigueral points out the need to be cautious on social networks, especially if its members identify themselves as employees: they could be considered spokespersons just because they work for the company. In this way, we remind you of the need not to publish malicious content and, if you identify comments that could damage the reputation of the Group, do not reply to them and contact the Communications Department directly.



4.9.- Confidentiality and protection of information

Grup Cañigüeral considers information and knowledge to be one of its main and essential assets for business management, which is why they must be subject to special protection. In this sense, any information that is not in the public domain must be protected, even when there is no formal obligation of confidentiality.

In line with the above, the Group takes all necessary measures to protect your private information, whatever the medium on which it is saved, and proceeds to store and conserve it in secure systems.

It should be remembered that all members of Grup Cañigüeral are subject to a duty of confidentiality regarding any non-public information and documentation relating to the Company that they possess or become aware of and to which they have access as a result of carrying out their activity; this information may not be used improperly for their own benefit or for the benefit of third parties. Indicate that any type of confidential information received from companies outside the Company shall also be covered.

Grup Cañigüeral will adjust its activity to current legislation on the protection of personal data entrusted to it by its members, candidates in selection processes or other persons, in compliance with current national and EU regulations on the Protection of Personal Data, and in particular, Organic Law 3/2018 of 5 December and its complementary provisions. Personal data is understood to be any information that can be used to identify an individual, directly or indirectly.

4.10.- Prohibition of political activities or donations

Grup Cañigüeral does not carry out political activities or donations. Legitimate lobbying activities on behalf of Grup Cañigüeral may only be carried out, where appropriate, by persons designated for this purpose and in compliance with the regulations established by the authorities in each country or community.

In addition, Grup Cañigüeral recognises the right of employees to exercise their freedom of expression and to participate in political activities as long as these do not interfere with their professional performance or give rise to a conflict of interest.

4.11.- Committing to sustainability

Grup Cañigüeral is committed to social and environmental sustainable development and strives to achieve the UN Sustainable Development Goals (SDGs). Grup Cañigüeral is also committed to working with its business partners and suppliers to apply best practices.



The Society asks its members to work on **pollution prevention, zero waste, saving water and energy consumption, efficient use of raw materials and resources.**

That is why Grup Cañigüeral assumes the need to protect and respect the environment, acting in accordance with the criteria of sustainability and good environmental practices.

Grup Cañigüeral's commitment to caring for the environment extends to all levels of the organisation, from the reception of products and/or supplies to the departure of any type of product from the company's facilities.

As a final proclamation, Grup Cañigüeral encourages and proposes to its suppliers, clients and operators with whom it enters into any type of contractual relationship to apply environmental protection measures.

4.12.- Helping to solve doubts

When members of the company are in doubt about the right decision to take, the following questions should be asked:

- **Is it legal?**
- **Does it comply with the values of the Code of Ethics?**
- **Would members of the Society feel comfortable defending this decision in court or in the media?**

5.- WHISTLEBLOWING CHANNEL

It is the obligation of all members of Grup Cañigüeral who become aware of any type of breach by another member of the Company of the contents of this Code of Ethics and Conduct, of the Company's internal policies, procedures and protocols and of the legislation in force within the Company, to file the corresponding complaint through the Complaints Channel created for this purpose (specifically, by sending an e-mail to the address canaldedenuncias@costabravafoods.com).

Communications must, in all cases, respect the criteria of proportionality and verisimilitude. The identity of the complainant(s) shall be kept confidential, avoiding any type of reprisals, and complaints may be filed anonymously.

However, if the data provided by the complainant(s) are required by administrative or judicial authorities, they will be provided to them in strict compliance with the applicable legislation.

The principles governing the Group's Whistleblowing Channel are the following:

- **Absence of retaliation for allegations and complaints made in good faith** against irregular conduct. Good faith implies providing honest, complete and accurate information, even if it could later be proven to be wrong.
- **Respect for the rights of persons involved in potential non-compliance**, who may provide any explanations they deem necessary.
- **Confidentiality** of the data and statements made, as well as the possibility of anonymizing the reports.
- **Proportionality**: decisions taken in an appropriate manner and considering the circumstances.
- **Completeness**: thorough research to verify veracity.

Individuals who violate the Code may be subject to disciplinary action, which could include termination of employment and legal sanctions.

The same applies to individuals who refuse to disclose information that may be relevant to an investigation, or to superiors who tolerate or retaliate for good faith reporting of a possible violation.

6.- PUBLICITY AND ACCEPTANCE

All members of Grup Cañigüeral are obliged to know and carry out their professional activity in accordance with the rules established in this Code of Ethics and Conduct. For this reason, they must make a written declaration expressly stating that they have received a copy of this Code in their own language in order to read and accept it, and ignorance of its contents shall not justify non-compliance.

In this regard, this Code of Conduct will remain published on the Company's website (www.costabravafoods.com) and will be the subject of appropriate communication, training and awareness-raising actions for proper understanding and implementation by all members of Grup Cañigüeral.

7.- COMPLETION AND INTERPRETATION

Failure to comply with the provisions of this Code of Ethics and Conduct and the policies, procedures and protocols of Grup Cañigüeral will result in disciplinary sanctions which may also entail the termination of the employment or commercial relationship that the offender maintains with the Company, without prejudice to any civil, administrative or criminal liability that the infringement of current Spanish legislation may entail for both the offender and the Company.

The content of this Code must be interpreted in conjunction with the rest of the policies, procedures and protocols that make up Grup Cañigüeral Crime Prevention Programme.

8.- DISSEMINATION, MONITORING AND UPDATING

This Code of Conduct shall be communicated and disseminated to all members of Grup Cañigueral. It is the responsibility of the Company's compliance body to ensure the application of this Code and to establish the criteria for its interpretation, proposing to the Board of Directors any guidelines it deems appropriate to develop and update the Code of Ethics and Conduct, as well as its policies, procedures and protocols, always with the aim of implementing a clear ethical culture in all its members on a day-to-day basis.

Likewise, the compliance body shall promote knowledge of the Code of Ethics and Conduct and associated regulations through a specific training plan. In all dissemination, communication and training actions, the existence of the Whistle-blowing Channel and the means of access established for its use shall be recalled, as well as the obligation to report any irregularities that may be detected.

9.- MONITORING AND CONTROL

The Board of Directors of the Company is responsible for supervising the operation and effectiveness of the Code of Ethics and Conduct. To this end, it may rely on external advisors to verify effective compliance with this Code and the internal regulations implementing and/or supplementing it.

10.- ENTRY INTO FORCE

This Code of Ethics and Conduct shall enter into force on 30 September 2020.

Riudellots de la Selva, 29 June 2020



Signed: Elisabeth Cañigueral Borrás
PRESIDENT OF GRUP CAÑIGUERAL HOLDING I.M.P.S.L.U.