



 **foodiverse**
CODE OF ETHICS





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I. OUR CODE OF ETHICS

The Foodiverse Group is much more than a food company. We are an upright, honest, and trustworthy multinational company, and this must remain unchanged over the years.

Our Code of Ethics is a declaration of our principles and values, as well as a set of guidelines on conduct designed to guide the behaviour of **all the individuals that belong to the Group** as they carry out their professional activity.

MISSION

At Foodiverse, we want to revolutionise healthy eating. To that end, our mission is not only to help the consumer maintain a balanced diet, but also to help them do it in an easy, appetising, and trendy manner, allowing them to enjoy their food, anytime, anywhere.

VISION

We aim to be the go-to company for consumers who want fresh and healthy products throughout every stage of their lives, creating long-term value for shareholders, workers, and collaborators, and generating a positive impact on our environment.

STRATEGY

Our 6 keys for sustainable growth:

With our talent as the cornerstone, we have built an organisation with a global vision which is locally managed, leader in products, expert in operations, and focused on satisfying the needs of every client. As a result, we ensure profitability and sustainable growth.

OUR IDENTITY



AGENTS OF CHANGE

We integrate change as an opportunity for growth.



HONEST AND TRUSTWORTHY

What we do is transparent and consistent with what we say and believe.



MANAGERS

We seek excellence with efficient management of our resources.



AMBASSADORS

We are the philosophy, vision, and values we preach.



COMMITTED

We do our best when we feel the Company's mission and shared values as our own.



ENTREPRENEURS

Above all, we create an entrepreneurial culture in which people lead the way and share successes.



OUR HOLD PRINCIPLE

We act with absolute hygiene, in an orderly manner, with utmost cleanness and total discipline.

To ensure that we all comply with our **Code of Ethics**, Foodiverse has a **Compliance Officer**, who is responsible for supervising, monitoring and enforcing compliance with regulations within the Group.

Together with the **Compliance Officer**, the **Ethics and Conduct Committee** is the body responsible for appropriately interpreting the Code and making sure that it is followed correctly.

In addition to the actions of the **Compliance Officer** and the **Ethics and Conduct Committee**, both the **Group's General Management** and the **Committee Board** – specifically the **Ethics and Compliance Director** – are committed to the observance, disclosure, and revision of the efficacy and degree of compliance.





II. OBJECTIVES

Foodiverse's Code of Ethics is a guide on how to act towards all individuals involved in the business units that currently belong to the Group or that may become part of it.

Our Code of Ethics is an essential part of the COMPLIANCE Model implemented at Foodiverse and it is extremely important that all of those who are subject to it are aware of and understand it.

The Code of Ethics brings together the Group's commitment to the principles of business ethics and transparency in all areas of activity, which establishes basic ethical behaviour criteria for all individuals in the Group.



III. SCOPE OF APPLICATION

The Code of Ethics must be followed by all those who work or collaborate with the Group, regardless of their level in the organisation, their position, and their geographical location.

For the purposes of the Code, employees, managers and administrators in the Group shall be considered **professionals**.

Those professionals to whom other codes of conduct apply, derived from the national legislation in the countries where they work, shall also be obliged to comply with Foodiverse's Code of Ethics.

The professionals in the Group are responsible for respecting and complying with this Code of Ethics.

Moreover, the professionals who manage or lead teams of individuals must ensure that the professionals in their charge know of and comply with the Code of Ethics, inspiring by their example, as indicated in our MANAGEMENT CULTURE.

A breach of the Code of Ethics will result in the failure to comply with a Group standard and will entail the adoption of the corresponding disciplinary measures adapted to the nature and circumstances of the violation of the Code.

Under the terms set out therein, the Code can also be enforced on clients, suppliers and other stakeholders with whom the Group and its professionals interact, to the extent which the values, principles and rules contained in the Code apply to them.



IV. COMPLIANCE MONITORING

1. THE COMPLIANCE OFFICER

The Compliance Officer is responsible within the Group for guaranteeing that the Code is followed, as well as receiving and managing reports of alleged failure to comply with the Code, in accordance with what is set out in the corresponding procedure.

The Compliance Officer (i) identifies the obligations that the company is subject to; (ii) contributes towards maintaining a level of ongoing training among the employees in terms of compliance with rules and; (iii) implements the necessary measures and checks in order to be aware of and anticipate possible risks and incidents.

2. THE ETHICS AND CONDUCT COMMITTEE

The Ethics and Conduct Committee is formed by professionals from the Group and is the body in charge of ensuring the correct interpretation and implementation of the Code in all of our businesses and countries.

The Ethics and Conduct Committee reports periodically to the Group's **General Management** and to the **Ethics and Compliance Director** regarding any questions or concerns, their resolution, level of compliance, incidents, and infractions to the Code of Ethics that may take place.

Any failure to apply with the Code of Ethics must be immediately reported to the Ethics and Conduct Committee and the Compliance Officer.





V. ETHICAL PRINCIPLES

1. COMPLIANCE WITH THE LAW

1.1. We are committed to complying strictly with the law in force in all places where we work, ensuring at all times that we **comply with what has been established in the Code of Ethics and in all Policies** that govern and regulate the activity and processes for the Group.

1.2. Our management team, as indicated by Foodiverse's MANAGEMENT CULTURE, leads through communication and influence, ensuring that the professionals in their charge receive all of the information that enables them to fulfil the legal and regulatory obligations applicable to their working role.

2. HONEST AND TRUSTWORTHY BEHAVIOUR

2.1. We are always honest in our actions. Our actions are coherent and show a trustworthy attitude at all times. We behave based on the principle that 'everyone should benefit.'

3. COMMITMENT TO HUMAN RIGHTS AND LABOUR RIGHTS

3.1. We are explicitly committed to respecting, defending, and promoting international agreements, legislation in force, and the principles related to Human and Labour Rights based on the United Nations Global Compact, particularly with the Sustainable Development Goals (SDGs) that we integrate across teams in our activity.

3.2. We do not employ any individual under the minimum legal working age and we reject any form, whether direct or indirect, of child labour, and we also prohibit forced and mandatory labour throughout the Group.



VI. GENERAL RULES OF CONDUCT

1. REMUNERATION POLICY

1.1. We offer a fair level of remuneration, appropriate to the labour market in which we carry out our business.

2. NON-DISCRIMINATION PRINCIPLES AND EQUAL OPPORTUNITIES

2.1. We promote and defend the principle of equal treatment and opportunities for our professionals, regardless of their race, colour, nationality, ethnic origin, religion, sex, political or sexual orientation, marital status, age, disability or any other condition.

2.2. The relationships between our

professionals are based on respect and non-discrimination.

2.3. We do not condone any displays of violence, or physical, sexual, psychological, moral or any other form of abuse, the abuse of authority in the workplace or any type of conduct that may give rise to an intimidating, offensive or hostile work environment for individuals

2.4. We guarantee the freedom of union affiliation and the effective recognition of the right to collective bargaining.

3. WORK-LIFE BALANCE

3.1. We promote policies that help to guarantee a work-life balance with fair remuneration and professional development, respecting the personal and family life of the professionals in the group.

4. RIGHT TO PRIVACY AND DATA PROTECTION

4.1. We respect our professionals' right to privacy in all forms and undertake not to reveal their personal data without their consent, except where it is obliged by the law or in order to comply with administrative or legal rulings.

4.2. All Group professionals who have access to personal information of third parties comply with the obligation of keeping said information confidential.

4.3. We guarantee professional secrecy of the personal data at the Group's disposal. We take all necessary measures to ensure confidentiality when said data needs to be passed on for business reasons and adhere to current legislation regarding data protection.

5. HEALTH AND SAFETY IN THE WORKPLACE

5.1. We undertake to adopt the measures considered reasonable to create a safe and healthy environment, following our principles:

- a) to maintain our HOLD principle in all workplaces.
- b) to raise awareness of health and safety in the workplace.
- c) to guarantee a suitable working environment.



6. PROFESSIONAL DEVELOPMENT AND TRAINING

6.1. We are firmly committed to our talent, and to that end, we build our teams, actively creating opportunities for development and internal promotion, aiming to encourage them to carry out multiple functions and leave their comfort zone, providing ongoing feedback, acknowledging effort and striving to overcome weaknesses in collaborators and teams.

6.2. We are actively collaborating to create a network of knowledge and innovation. To do this, we believe that it is fundamental that our professionals participate and share their knowledge and professional experience in the university and scientific sphere.

When said participation is within working hours it must be previously authorised and unpaid.

7. GIFTS AND PRESENTS

7.1. We do not accept or give presents or gifts when carrying out our professional activity. In exceptional cases, gifts may be given or accepted if the three conditions below are all fulfilled:

- i. Their value is symbolic;
- ii. They are signs of courtesy or commercial marketing; and
- iii. They are prohibited neither by law nor by generally accepted business practices.

7.2. We neither give nor accept advantages or benefits of any kind that may be considered a bribe or commission from a third party, such

as civil servants, employees of other companies, political parties, customers, suppliers or shareholders.

7.3. If there is any doubt as to what is acceptable, the offer must be discussed beforehand with the immediate superior, who will pass on the query to the Ethics and Conduct Committee.

7.4. What is to happen to any presents or gifts received by professionals that do not meet the requirements of the Code shall be decided by the Ethics and Conduct Committee.

8. CONFLICTS OF INTEREST

8.1. Our actions and activities defend the interests of the Group above any other external influence and situations of conflict of interest are to be avoided.

A conflict of interest is considered to exist when the private interests of the professionals or individuals linked to them interfere with their professional duties and responsibilities.

8.2. In the event of any doubt as to whether there is a conflict of interest, the situation in question shall be reported to the corresponding superior and, if necessary, to the Ethics and Conduct Committee who shall assess the situation.

9. HANDLING OF INFORMATION

9.1. We obtain, process, protect and keep information confidential, always guaranteeing professional secrecy.

9.2. Sensitive and confidential information is subject to professional secrecy and the contents thereof may not be passed on to third parties unless required by law, the courts or an administrative authority.

9.3. We undertake to provide sufficient security arrangements and to apply the necessary measures to protect the sensitive and confidential information registered in hardware or software against any internal or external risk of unauthorised access, tampering or destruction, whether intentional and accidental.

9.4. The disclosure of sensitive and confidential information, as well as its use for private purposes goes against the Code of Ethics.

9.5. Any reasonable indication of a leak of sensitive and confidential information and private use thereof must be reported by those who become aware of it to their immediate superior and the Compliance Officer.

9.6. This duty of confidentiality shall continue to be maintained after the contractual relationship between the professional and the group comes to an end.



10. INSIDER INFORMATION

10.1. We guarantee the confidentiality of any insider information belonging to the Group and avoid sharing it with third parties.

Insider information is any specific information about the Group or its activities that is not public and which, if it were to become public, would affect the business.

11. PROFESSIONAL LOYALTY

11.1. We set an example by our actions at all times, striving for economy and efficiency in our use of resources, taking into account the good of the Group over the individual. More specifically, and in accordance with said general rule:

(i) We protect and look after the Group assets placed at our disposal, not using them more than necessary.

(ii) We incur only those expenses which are strictly necessary for the proper development of our functions, ensuring that we properly use the financial resources that are provided to us to that end. We are committed to follow scrupulously all policies that are implemented by the Group, in particular those aimed at controlling the organisation's fixed costs.

(iii) We guarantee appropriate use of the IT and telephone systems, stepping up security measures and avoiding inappropriate use.

(iv) We respect intellectual property and the right of use that corresponds to the Group, whether it is a consequence of the Group's professional activity or that of third parties.

(v) We comply with current regulations regarding data protection, treating all personal information confidentially.

(vi) We only use the Group's image, name or brands in order to carry out our professional activity correctly.

(vii) In the event of any business opportunity, the Group's interests take priority over personal interests.





VII. OUR RELATIONSHIP WITH OTHER STAKEHOLDERS

1. OUR RELATIONSHIP WITH SHAREHOLDERS

1.1. We fairly, transparently and promptly provide shareholders with all information that may directly or indirectly affect the Group's evolution and business.

1.2. Not only are we committed to providing shareholders with the maximum possible benefits, but also to doing it in a sustained manner.

2. OUR RELATIONSHIP WITH THE AUTHORITIES

2.1. In our relationships with the authorities and regulatory and administrative bodies we collaborate with transparency and in accordance with the law in defence of the legitimate interests of the Group.

2.2. We do not make contributions to political parties, authorities, bodies, public entities or institutions in general on behalf of the Group companies.

3. RELACIÓN CON EL CONSUMIDOR

3.1. We focus entirely on food safety and the quality of our products. Continual improvement and our innovative spirit put us in a superior position compared to our competitors as far as food safety, quality, service and prices are concerned.

3.2. We have been awarded the most important agri-food certifications in terms of quality, which are subject to very high demands.

3.3. We provide true, clear and detailed information on our product labels with the aim of providing the necessary nutrition information for our consumers.

4. OUR RELATIONSHIP WITH SUPPLIERS

4.1. We choose our suppliers taking into account social, ethical and environmental criteria with the aim of selecting those who, as well as offering the best conditions in terms of quality, service and price, share the principles and commitments set out in our Code of Ethics.

4.2. Objectivity is our basic principle when selecting and dealing with suppliers.

4.3. Our relationships with suppliers of goods and services are based on ethics and legality. We avoid preferential treatment.

4.4. Prices and other information provided by suppliers are confidential and may not be used outside the Group unless prior written authorisation is obtained.

4.5. When selecting our suppliers, it is important to us that they: (i) respect current legislation; (ii) comply with internationally recognised human rights laws with due respect and; (iii) ensure that they neither breach nor abuse said rights in their business operations.

4.6. When selecting suppliers, we rate the following ethical behaviour:

- eliminating any form of child labour
- eradicating any kind of forced labour or work carried out under duress
- preventing any kind of discrimination in the workplace
- respecting the maximum working hours and minimum salaries established in accordance with current legislation in the country in which they carry out their activity
- guaranteeing that their employees carry out their work according to current health and safety standards

4.7. Where applicable, suppliers shall take responsibility so that the companies subcontracted by them work in accordance with the values, principles and rules under this Code and within the corresponding legal framework.

4.8. We also value the commitment of potential suppliers to minimising the environmental impact of their activity and favouring development and the widespread use of technologies that respect the environment.

4.9. We do not maintain relationships with suppliers who participate in any kind of corruption, extortion or bribery which is widely known or of which the Group has knowledge, which may go against the generally accepted trade rules or the principles of the Code.





5. OUR RELATIONSHIP WITH COMPETITORS

5.1. We undertake to compete legally in the markets in which we operate. We encourage free competition, comply with current legislation and avoid any behaviour that may constitute abuse.

5.2. We neither adopt nor promote practices of unfair competition and we are committed to ensuring that the applicable antitrust laws are complied with.

5.3. We guarantee that competitors' and third-party intellectual and industrial property rights will be respected and exercised legitimately.

6. OUR RELATIONSHIP WITH THE MARKET

6.1. We adopt **information transparency** as a practice and undertake to convey trustworthy information to the markets. Economic and financial information, both internal and external, faithfully reflects the economic reality of the Group.

6.2. The department responsible for communication within the Group is in charge of relationships with the media. No professional shall provide the media with information of any kind that may affect the Group, its business or its professionals without the prior knowledge and authorisation of said department or the Group's Committee Board.

7. OUR RELATIONSHIP WITH SOCIETY

7.1. We maintain an active commitment to the principles of the general policy of **Corporate Social Responsibility**. We act responsibly on an economic, social and environmental level.

7.2. We contribute to community welfare and work actively with non-governmental organisations, foundations and institutions on the development of numerous programmes, including the training and integration of individuals with disabilities and assisting socially disadvantaged groups.

7.3. We encourage the creation of local employment and wealth in all of the geographical areas in which we carry out our activity.

7.4. We are firmly committed to policy principles against corruption and fraud, particularly to not adopting any practices that may be considered irregular when forming relationships with customers, suppliers, competitors, authorities, etc., including those related to money laundering.

7.5. We maintain total transparency in our relationships with customers and suppliers. Payments will be made and received by bank transfer. In exceptional cases, always in accordance with current legislation regarding money laundering, other methods for making/receiving payments may be used.

8. PROTECTING THE ENVIRONMENT

8.1. We express our concern and a firm commitment to respecting and protecting the environment.

8.2. We take any actions that may be necessary to minimise the environmental impact of our activity, with the aim of reducing pollution, using resources efficiently, minimising water, paper and energy consumption, reducing waste and emissions, encouraging recycling and looking for eco-efficient solutions.

8.3. Our commitment to the environment is a responsibility shared by all and we strive to guarantee that the applicable environmental laws are complied with.

8.4. We also encourage the implementation of good environmental practices among suppliers and customers.

9. SPONSORSHIP AND DONATIONS

9.1. Our community welfare and sponsorship activities are always carried out with entities that fit in with the principles set out in our Code of Ethics.

9.2. Approved donations or sponsorship are subject to monitoring to ensure that they are provided according to the principles set out in the Code of Ethics, as well as to check that the destination of the funds or goods contributed by the Group to the specific activity or sponsorship is appropriate.





VIII. NOTIFICATION OF COMPLAINTS

1. ETHICS MAILBOX

1.1. The ethics mailbox is a channel for the professionals in the Group to report any behaviour that may imply an irregularity, or any activity against the law or the operating standards in the Code of Ethics.

1.2. Any correspondence for the ethics mailbox is to be sent to the following email address: **compliance@foodiverse.com**

2. NOTIFICATION OF COMPLAINTS

2.1. No professional may justify any behaviour or bad practice that goes against the Code of Ethics by claiming that it was an order from a superior or that they were unaware of the contents of the Code. Nobody, regardless of their position in the Group, is authorised to ask any other person to go against the Code of Ethics.

2.2. Any professional can communicate honestly, under guarantee of absolute confidentiality, any presumed breach of any rule or principle of the Code of Ethics or any other action that may be considered fraudulent.

2.3. Nobody who reports suspicious or illicit activities, or activities that contravene the Code, will be sanctioned for doing so.

3. PROCESSING REPORTS OF COMPLAINTS MADE TO THE ETHICS MAILBOX

3.1. The Compliance Officer is responsible for processing any complaints made via the ethics mailbox. Should the complaint affect the Compliance Officer or a member of the Ethics and Conduct Committee, said person may not participate in its processing and a substitute will be designated.

3.2. In all investigations the rights to privacy, defence and presumed innocence of those investigated are guaranteed.



IX. OVERSIGHT

This Code of Ethics has been approved by the Group's General Management.

The Ethics and Conduct Committee, together with the Compliance Officer, will periodically assess the extent to which this Code of Ethics has been circulated and is effective and shall make any necessary updates.

X. HOW DO I PUT INTO PRACTISE THE PRINCIPLES OF THE CODE?

When you're not sure, ask yourself:

- a. Is it coherent with our Business Model and Philosophy?
- b. Is it legal?
- c. Is it ethical?

In case of doubt regarding any conduct or behaviour set out in this Code or outside of it, please ask for advice.

You can go directly to your superior or send an email to the Ethics and Conduct Committee at: **compliance@foodiverse.com**



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