



CODE OF ETHICS FOR SUPPLIERS

Review:	03
Date Edition:	13/05/20
Date Revision:	10/12/24

1.- OBJECTIVE

COSTA BRAVA MEDITERRANEAN FOODS- GRUPO CAÑIGUERAL (hereinafter the “Group” or the “Organisation”) aims to guarantee ethical behaviour based on values such as honesty, integrity, transparency and safety, both for itself and its team as well as for its suppliers. This Supplier Code of Ethics formalises the ethical, social, environmental and legal requirements that all companies must accept and comply with in order to collaborate with the Group. Companies with a working relationship with the Group must also undertake to extend these requirements to their supply chain.

2.- SCOPE OF APPLICATION

Applies to the Group’s directors, professionals and suppliers and those of investee companies over which the Group has effective control. In the case of subcontracting of the production of goods and/or the provision of services contracted by the Organisation, the supplier undertakes to ensure that the contents of this Code are implemented by the sub-contractors as far as it is possible to achieve this.

The qualitative and quantitative objectives related to this policy - including specific targets (such as percentage reductions), monitoring frequencies and expected trends - are defined in the document ‘Sustainability Strategic Plan 2021-2025’, available for review in the framework of external audits and verification processes.

Note: this strategic document is available upon request to interested parties.

3. - ETHICAL COMMITMENTS

The supplier undertakes in its negotiations and decisions to comply with the laws of the countries in which it operates and to meet its tax obligations. Any form of corruption or bribery and attempts to influence business relationships through gifts or advantages of any kind are prohibited.

This code of ethics must be signed by all suppliers to confirm their commitment, and on-site audits (based on supplier risk assessments) and sustainability questionnaires will be carried out to verify that there is no illegal behavior among Costa Brava Mediterranean Foods suppliers and to monitor their ESG sustainability performance.

These actions will have linked objectives such as increasing the number of on-site audits of suppliers carried out annually or increasing the percentage of suppliers who guarantee us a minimum ESG standard based on their responses to the questionnaire (this last objective, for example, is also linked to the Group's Financing Framework). Repeated failure to comply with the signing of commercial policies (supplier code of ethics, anti-corruption policy, and purchasing policy), filling out the Sustainability questionnaire, failure to comply with aspects of this code of ethics, etc., may lead to the termination of the professional relationship or the implementation of disciplinary measures to be defined in each case.

Responsibilities related to suppliers and their good practices will depend directly on the purchasing departments, and on the quality and sustainability departments for matters that concern them, which is why all of the mentioned parties will be aware of this code of ethics and the points developed therein.

4.- HUMAN RIGHTS

All suppliers must comply with the principles of the Universal Declaration of Human Rights, the conventions that regulate its application and the recommendations of the International Labour Organisation (ILO) with regard to workers' rights. The supplier shall avoid abuses or illegal activity relating to human rights, discrimination on the basis of ethnic origin, culture, gender,

disability, nationality, religion, age, social origin or ideology. It shall prohibit child labour, in compliance with international and national provisions and declarations, as well as forced, coerced or inhumane labour. It shall not subject its employees to any form of physical abuse or intimidation and shall establish protocols to prevent any form of sexual harassment.

5.- WORK ENVIRONMENT

The supplier shall encourage treatment with dignity, respect, honesty and sensitivity and prohibit degrading treatment. It must uphold freedom of association and the right to collective bargaining, and provide safe working conditions in compliance with applicable occupational risk prevention.

The supplier shall comply with applicable labour laws and collective agreements in general and in particular with regard to working hours, rest breaks and holidays. Workers shall be paid in accordance with laws and collective agreements, at least at wages equal to the legal minimum wage or, in the case of countries where this minimum wage does not exist, at a standard wage for their type of industry and activity that is adequate to cover the basic needs of the worker.

6.- ENVIRONMENT AND HEALTH

Suppliers are committed to working in a manner that preserves health and the environment and avoids hazards to the people and communities in which they work, and must therefore comply with the relevant legislation. They shall minimise the use of hazardous substances and manage hazardous waste responsibly. They shall use materials and resources efficiently and give preference to reusable, recycled and recyclable materials. Each supplier shall obtain materials from sustainable sources where possible, use energy efficiently and seek to minimise harmful emissions.

Protecting the health of workers involves taking measures to avoid risks and accidents or illnesses of any kind caused at work. Each supplier shall provide workers with the protective equipment necessary for their work.

7.- INTELLECTUAL PROPERTY AND DATA PROTECTION

Information shared by the Organisation with the supplier regarding clients or suppliers, procedures, objectives or results must be protected and treated confidentially. The supplier must take measures to protect the intellectual property of COSTA BRAVA MEDITERRANEAN FOODS- GRUPO CAÑIGUERAL and its clients. With regard to Data Protection, the supplier shall process personal data in accordance with current legislation.

8.- GOOD GOVERNANCE

COSTA BRAVA MEDITERRANEAN FOODS - CAÑIGUERAL GROUP has in place a protocol for managing, investigating and responding to reports of improper activity affecting its organisation, which is applicable to all personnel with whom it has a contractual relationship under labour, commercial or civil law, including collaborators, suppliers or subcontractors.

The Organisation has implemented monitoring measures for the prevention of crime within the entity and any such incident detected must be reported using the following e-mail address: canaldedenuncias@costabravafoods.com. For its part, the supplier undertakes to implement corrective actions, if necessary, as a result of any verification activity it has carried out in its company and which has revealed irregularities.

Depending on the type of supply (live animals, raw materials for the production chain, technology, transport or other), additional requirements may be incorporated into approval procedures and/or contracts.

Non-compliance by the supplier with the contents of this Code may have consequences for the contractual relationship, ranging from a simple warning to disqualification as a supplier.

Review history:

Review	Date	Description of the modifications
00	13/05/2020	Creation of the supplier code of ethics with the aim of communicating directly with suppliers about our ideology in the areas covered by this policy. The need for this code was to differentiate it from the Group's code of ethics by segmenting its target audience.
01	01/02/2022	Update of the language to align it with the Sustainable Development Goals (SDGs) most relevant to the Group.
02	18/07/2023	Incorporation of the section referring to the whistleblowing channel and its related email. Updating the format of the policy.
03	10/12/2024	Review of the document to assess possible modifications. This review history is included in the document to provide a public record of the changes that have taken place and a clarification is added on the objectives related to the supplier code of ethics.

Girona, 10 December 2024



Signed Elisabet Cañigüeral Borràs.

President of COSTA BRAVA MEDITERRANEAN FOODS – GRUP CAÑIGÜERAL