



FREEDOM OF ASSOCIATION POLICY

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1. PURPOSE

COSTA BRAVA MEDITERRANEAN FOODS - Grup Cañiguerol (hereinafter, "CBMF", the "Group" or the "Company") respects and recognises the fundamental right of its employees' freedom of association and collective bargaining. The Company shall never engage in any form of retaliation against employees for choosing to participate or not participate in any association, workers' organization, or collective bargaining, provided such activities are not for unlawful purposes.

Thus, the Group has signed up to the **Charter of Fundamental Rights of the European Union**, which in article 12 establishes that "Everyone has the right to freedom of peaceful assembly and to freedom of association [...], which implies the right of everyone to form and to join trade unions for the protection of his or her interests". It likewise observes the **Spanish Constitution**, which in article 22 recognises the right of association for all citizens.

Furthermore, the Group believes that **collective bargaining** is a key way for employers, their organisations and trade unions to be able to set fair salaries and working conditions, and to secure equal opportunities between men and women.

Suspensions, dismissals and all other disciplinary measures provided for in current employment legislation against employees shall be considered to be forms of retaliation against employees.

In addition, the Company respects and defends democracy by guaranteeing the right to freedom of expression as a fundamental right and to take part in political activities in private life, provided they do not interfere with performance at work or give rise to conflicts of interest.

Finally, the Group does not engage in political activities or funding, nor may anyone do so on its behalf, as defined in the Company's Anti-corruption Policy, and it is expressly prohibited to participate in any type of politics on behalf of the Company.

Thus, legitimate lobbying on behalf of the Group may only be carried out, if appropriate, by persons designated for this purpose in compliance with the regulations put in place by the authorities in each country or local community.

2. SCOPE OF APPLICATION OF THIS POLICY

- This Policy must be strictly complied with and safeguarded by the persons listed below:
 - a. The members of the Company's Board of Directors.
 - b. The Company's senior management.
 - c. The employees and outsourced staff who provide services to the Company, whatever the legal employment framework they are subject to in rendering such services.
- This Policy will extend to any natural person or legal entity with which the Company enters into a relationship of whatsoever nature, provided that this is necessary to achieve a given purpose.
- This policy is shared with all internal stakeholders, and they are informed of the possible disciplinary measures that would result from non-compliance with the provisions of this document. This policy is available to external stakeholders on the Group's website and communication channels.
- The management and sustainability committees, as well as the executives and managers of all Group companies, are responsible for monitoring and enforcing the provisions of this Policy.
- The qualitative and quantitative objectives related to this policy – including specific targets (in terms of percentage reductions), monitoring frequencies, and expected trends – are set out in the 2021–2025 Strategic Sustainability Plan, which is made available for review in the framework of external audits and verification processes.

Note: this strategic document is available on request to any stakeholders.

3. UNDERTAKINGS AND GUIDING PRINCIPLES

- The Company undertakes to respect employees' right of association and collective bargaining if they do so legally and peacefully, without taking any form of retaliation.
- The Company condemns all forms of association that pursue criminal purposes or use means classed as a crime.
- The Company may not use force, threats, coercion, intimidation or police presence to intimidate employees or to break up a peaceful meeting.
- The Company may not deny employees their rights of freedom of association and collective bargaining by controlling them or favouring one organisation over another.
- The employer shall not interfere with workers' ability to form other organizations that represent them..
- Associations may only be disbanded or suspended from carrying out their activities by virtue of a court ruling.
- The Company must comply with all laws and regulations related to collective bargaining and the freedom of association.
- The Company understands collective bargaining as a means of ensuring equality among workers and setting their pay conditions, work schedules, training, health and safety at work, and equality of treatment.
- An employee organisation is entitled to elect its trade union representatives and to conduct its activities without interference by the Company.

- The employer must negotiate in good faith with any legally approved trade union or any member of a trade union lawfully representing employees.

4. INVESTIGATION WITH SAFEGUARDS

All members of the Group who become aware of any type of breach by another member of the Company of the content of this Policy must file a report through the **Whistle-Blowing Channel** set up for this purpose (specifically, by sending an email to canaldedenuncias@costabravafoods.com). Thus, any person who has experienced or witnessed any acts of discrimination for having used the right of freedom of association may report this situation through the Whistle-Blowing Channel in place at the Company.

- The processing, investigation, resolution and, as the case may be, possible sanction of the events involved in a report will be governed by the provisions in the **Guidelines on the Handling, Investigation and Response to Internal Reports**
- All reports of a breach of the content of this Policy will be handled and processed in the strictest confidence to prevent any type of retaliation against whoever reports them.

5. SUPERVISION

- Once a year, the Compliance Body must randomly review some cases of recruitments and dismissals in order to check that the procedures were followed and that everything was conducted fairly, honestly and consistently.

6. DISCLOSURE, PROMOTION AND ACCEPTANCE

- All members of the Group must be familiar with the rules set forth in this Policy and must do their jobs in compliance with it.
- The content of this Policy will be explained to employees. Likewise, new recruits will be told about it on the day they join the Company and it will be disseminated on the communication channels the Company has in place.
- This Policy will be available to employees from the Company's HR Department.

7. COMPLIANCE AND INTERPRETATION

Failure to comply with the provisions of this Policy will give result in disciplinary measures, which may include the termination of the employment or business relationship between the offender and the Company, without prejudice to the civil, administrative or criminal liabilities that may arise under applicable Spanish law, both for the individual and for the Company.

The content of this Policy must be interpreted alongside the rest of the policies, procedures and guidelines that make up the Grup Cañigueral's Crime Prevention Programme.

8. DISSEMINATION, MONITORING AND UPDATES

This Policy will be disclosed and disseminated to all members of Grup Cañigueral. The Company's Compliance Body, in addition to the members of the Human Resources Department, must enforce this Policy and establish the criteria for its interpretation.

Furthermore, the Compliance Body, in addition to the members of the Human Resources Department, must promote awareness about this Policy.

REVISION HISTORY:

Revision	Date	Description of changes
00	24/03/2021	This Freedom of Association Policy was created to recognise the right to freedom of association and collective bargaining that all of the people who work for the Company have. No retaliation may be taken against lawful arrangements of association.
01	14/06/2022	Update of the language to align it with the most relevant Sustainable Development Goals (SDGs) for the Group.
02	20/09/2023	Amendment of the section on the Whistle-Blowing Channel and its email address. Update of the Policy's format.
03	17/12/2024	Revision of the document to assess potential changes to it. This revision history has been added to this document so that there is a public record of changes made to it.

Girona, 17 December 2024



Signed: Elisabet Cañigüeral Borràs.

President of COSTA BRAVA MEDITERRANEAN FOODS – GRUP CAÑIGÜERAL