	Code of Ethics of ESTEBAN ESPUÑA S.A.	Created by: Compliance Committee
		Approved by: Esteve España Sargatal
		Date of approval: 02/07/2024
		Version: 3.0

Values and commitments of ESTEBAN ESPUÑA S.A.

ESTEBAN ESPUÑA S.A. (hereinafter, ESPUÑA) aims for its conduct, and that of the individuals associated with it, to align with and adhere not only to current legislation and its corporate governance system but also to widely accepted ethical principles and social responsibility standards.

This Code of Ethics reflects ESPUÑA's commitment to the principles of business ethics and transparency in all areas of activity, establishing a set of principles and guidelines for conduct aimed at ensuring the ethical and responsible behaviour of all Company employees, in the development of their activity and regardless of their hierarchical level, geographical location or functional role. In fact, the company's leaders have an additional responsibility: they must lead by example, making decisions that promote and uphold this Code and its practices. Their guidance and leadership are vital in creating a positive and ethical work environment.


Moreover, ESPUÑA may ask its suppliers, collaborating companies, clients and other stakeholders to formalise their commitment to comply with this Code of Ethics or with the guidelines established in it.

Ethical principles

Shareholders and Owners

In exercising their ownership rights, they must:

- Structure the company as an instrument for wealth creation, aligning its inevitable purpose of generating profits with sustainable social development and respect for the environment, ensuring that all its activities are carried out in an ethical and responsible manner.
- Establish the company as an institution for the medium and long term, without allowing the pursuit of short-term profit to jeopardise its continuity.
- Exercise, in an informed and responsible manner, their voting rights at the General Shareholders' Meetings and, in doing so, always demand ethical performance from the company, including the approval of the corresponding Code of Ethics and ensuring its effective application.
- Seek a fair balance between capital and labour so that workers receive fair compensation for their work through their salaries.
- Appoint as directors and executives individuals who have the appropriate qualifications and experience and who exercise their management professionally, ethically and responsibly.
- Define and defend the company's mission and values in line with its Code of Ethics.

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Directors and Executives

In the exercise of their administrative and management functions, they must:

A) In connection with their **Management functions:**

- Carry out a professional, ethical and responsible practice of their activity.
- Comply with and enforce compliance with the company's Code of Ethics and, to this end, make it known and establish the appropriate mechanisms to ensure its application. In particular, there should be a body, ideally an Ethics Committee, composed of individuals with sufficient power to enforce the Code and correct violations.
- Promptly and accurately inform the owners or shareholders of the company's situation and prospects.
- Comply and enforce compliance with generally accepted accounting standards and principles and establish internal and external control systems and risk management procedures appropriate to the company's characteristics.
- Maintain the company's books and records accurately and honestly, enabling information to be obtained and decisions to be made in a conscientious and responsible manner.
- Provide the company's external and internal auditors with all the information and explanations they require to carry out their work.
- Subordinate their personal interests to those of the company when acting in the name and on behalf of the company and not to use corporate assets for their own benefit except with due transparency, with the prior authorisation from the relevant corporate body and for the appropriate market compensation.
- Immediately inform the company's governing body of any fact or situation that could involve or lead to a conflict between the interests of the company and the individual interests of the director or executive, and refrain from intervening in its resolution.
- Maintain the confidentiality of the background, data and documents to which they have access by reason of their functions in the company, even after they have ceased to perform them.
- Ensure the timely payment and fulfilment of the debts and obligations of the company without delays or unjustified defaults and to pursue the collection of its credits with the diligence required in each case.
- Develop and maintain a succession plan for key positions in the company, so that the continuity of the company does not depend on the permanence of any director or executive.
- Choose their collaborators and subordinates in accordance with the principles of merit and ability, seeking only the interests of the company.

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B) In relation to **suppliers and customers of the Company:**


- Deal with suppliers of goods and services in an ethical and lawful manner.
- Seek and select only suppliers whose business practices respect human dignity, do not violate the law and do not jeopardise the company's reputation.
- Select suppliers based on the suitability of their products or services, as well as their price, delivery conditions and quality, not accepting or offering gifts or commissions, in cash or in kind, that may alter the rules of free competition in the production and distribution of goods and services.
- Strive for excellence in the company's goods and services, ensuring that its customers and consumers receive the expected satisfaction from them.
- Guarantee the company's products and services and to quickly and efficiently attend to consumer and user complaints, seeking their satisfaction beyond mere compliance with current regulations.

C) In relation to **competitors of the Company:**

- Not to abuse a dominant or privileged position in the market.
- Compete fairly with other companies, cooperating to achieve a free market based on mutual respect among competitors, refraining from unfair practices.
- In particular, not to attract customers from other competitors through unethical methods.

D) In relation to **employees of the Company:**

- Treat employees with dignity, respect and fairness, taking into consideration their different cultural sensitivities.
- Not to discriminate against employees on the basis of race, religion, age, nationality, sex or any other personal or social condition unrelated to their merit and ability.
- Not to allow any form of violence, harassment or abuse at work.
- They will not be required to surrender under the custody of ESPUÑA any deposits or identity documents and will be free to leave ESPUÑA after a reasonable notice period.
- Recognise the rights of association, unionisation and collective bargaining.
- Encourage the development, training and professional advancement of employees.
- Link employee compensation and promotion to their merit and ability.
- No child labour (under 16 years of age) will be employed. Minors under 18 years of age shall not work at night or in hazardous conditions.

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- The minimum remuneration shall be that fixed in accordance with the salary tables of the meat sector agreement in force.
- Working hours will comply with Spanish legislation and the meat sector agreement in force. Overtime will be voluntary and will be compensated according to the salary tables of the meat sector agreement in force.
- Ensure occupational health and safety, adopting all reasonable measures to maximise the prevention of occupational risks.
- Promote work-life balance for employees.
- Promote the integration of people with disabilities or impairments into the workforce, removing all barriers within the company to facilitate their inclusion.
- Facilitate employee participation in the company's social action programmes.


E) In relation to the **civil society.**

- Respect human rights and democratic institutions and promote them wherever possible.
- Maintain the principle of political neutrality, not interfering politically in the communities where it carries out its activities, as a sign of respect for the different opinions and sensitivities of the people linked to the company.
- Interact with public authorities and institutions in a lawful and respectful manner, neither accepting nor offering gifts or commissions, in cash or in kind.
- Make contributions to political parties and public institutions only in accordance with current legislation and, in any case, guaranteeing their transparency.
- Collaborate with Public Authorities and non-governmental entities and organisations dedicated to improving the levels of social care for the most disadvantaged.

Compliance Committee. Ethical Channel

Compliance Committee

- ESPUÑA's Compliance Committee is an internal and permanent collegial body with responsibilities in the area of regulatory compliance and the Company's corporate governance system.
- In accordance with Law 2/2023, regulating the protection of individuals who report regulatory violations and the fight against corruption, the Governing Body is competent to appoint, remove or dismiss the person in charge of the System.

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- The Governing Body of ESPUÑA has appointed a collegial body, the Compliance Committee, as the System Manager, delegating to one of its members the powers to manage the Internal Reporting System and handle investigation proceedings.

- The Compliance Committee, as the Manager of the Internal Reporting System (Ethical Channel), shall act in accordance with the provisions of the current Ethical Channel Operating Policy.

- The Compliance Committee shall have the material and human resources necessary for the performance of its functions.

- The Compliance Committee shall have the following responsibilities with respect to the Code of Ethics:

a) Promote the dissemination, awareness and compliance with the Code of Ethics by driving training and communication initiatives that it deems appropriate, in accordance with the principles of cooperation and coordination with the different departments of the Company.

b) Provide binding interpretations of the Code of Ethics and address any queries or doubts raised regarding its content, application, or compliance, particularly concerning the application of disciplinary measures by the competent bodies.

c) Initiate verification and investigation procedures for complaints received and to issue the appropriate resolutions on the cases processed.

d) Annually assess the level of compliance with the Code of Ethics.


e) Report to the competent governing bodies on compliance with the Code of Ethics.

f) Promote the approval of the internal regulations that may be necessary for the development of the Code of Ethics and for the prevention of its violations, in collaboration with the various corporate departments and in coordination with the Company's compliance departments.

g) Approve procedures and action protocols to ensure compliance with the Code of Ethics.

h) Any clarification, addition, or development shall under no circumstances constitute a modification of the Code of Ethics, except when required by mandatory regulations.

- The composition and operation of the Compliance Committee shall be regulated in the Compliance Committee Regulations, which are part of ESPUÑA's corporate governance system. These Regulations were approved by the Compliance Committee at its meeting held on 23 October 2017 and ratified, on the same day, by the Company's Governing Body. In this regard, the Compliance Committee Regulations were updated on 26 March 2024.

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Ethical Channel

- The Ethical Channel aims to promote compliance with the law and the rules of conduct established in the entity's Code of Ethics, as well as in the internal regulations and procedures that implement it and in the other regulations imposed by ESPUÑA's regulatory framework.
- The Ethical Channel is a means of communication for reporting actions or omissions that may constitute violations of European Union law or serious or very serious criminal or administrative offences of Spanish national law.
- The Ethical Channel is available to all individuals who, within an employment or professional relationship with ESPUÑA, report (even anonymously) any irregularity determined in the Operating Policy of the Group's Ethical Channel. In this regard, it will not only be possible to receive and process communications from all members of the Group such as employees, managers, shareholders or members of the Governing Body, but also from external persons such as collaborators, suppliers, subcontractors and any individual or entity that has a professional or work relationship with the Group.
- ESPUÑA undertakes to treat at all times the personal data received through the Ethical Channel in an absolutely confidential manner and in accordance with the intended purposes.
- Communications addressed to the Ethical Channel shall be managed and processed in accordance with the rules established in the Operating Policy of the Group's Ethical Channel.

Additional Provisions

Disciplinary regime

- The Company will implement the necessary measures for the effective application of the Code of Ethics.
- No one, regardless of their level or position, is authorised to request that an employee commit an illegal act or one that contravenes the provisions of the Code of Ethics. Furthermore, no employee may justify improper or illegal conduct or conduct that contravenes the provisions of the Code of Ethics on the grounds of an order from a superior.
- When the Compliance Committee determines that a Company employee has carried out activities that contravene the law, the Code of Ethics, or any of ESPUÑA's internal regulations, the Company may adopt the appropriate measures in accordance with the

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applicable disciplinary regime and, specifically, with the provisions of the applicable Collective Agreement and the Spanish Workers' Statute.

- When the facts could be indicative of a criminal offence, the corresponding information shall be immediately forwarded to the Public Prosecutor's Office. In the event that the facts affect the financial interests of the European Union, the matter shall be referred to the European Public Prosecutor's Office.

Update

- The Code of Ethics will be reviewed and updated periodically, taking into account the annual report of the Compliance Committee, as well as the suggestions and proposals made by ESPUÑA's employees and managers.

- Any review or update that involves a modification of the Code of Ethics will require the approval of the Governing Body of ESPUÑA, following a report from the Compliance Committee.

Acceptance

- ESPUÑA's employees therefore accept the rules of conduct established in the Code of Ethics.

- Employees who join or become part of the Company in the future shall expressly accept the principles and standards of conduct set forth in the Code of Ethics.

- The Code of Ethics will be attached to the employment contracts of all ESPUÑA employees.

Approval

- The Code of Ethics was approved by the Company's Governing Body on 2 July 2024.



Esteve Espuña Sargatal
Manager
Esteban Espuña, S.A.

Olot, 2 July 2024.