

JUNE 2021



CODE OF BUSINESS CONDUCT

HUMAN RESOURCES DEPARTMENT

CONESA GROUP

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0. INTRODUCTION.

The international community is increasingly involved in the fight against crime. Proof of this are rules such as the Brussels Convention of 26 May 1997 on combating corruption in the European Union civil service, the New York Convention of 9 December 1999 on terrorism, Directive 2011/36/EU of the European Parliament and of the Council on preventing and combating trafficking in human beings and protecting victims, Directive 2008/99/EC of the European Parliament and of the Council on the protection of the environment through criminal law and European Union Framework Decisions 2005/222 on attacks against computer systems, 2004/757 on punishing drug trafficking and Framework Decision 2004/68 on sexual exploitation and child pornography, among others, as well as the United Nations Convention and Protocols against transnational organised crime.

The CONESA Group, since its creation, has shown a firm ethical commitment, expressed in corporate values, which are projected throughout the organisation through the mission and vision of the Group:

- Mission:

The production of first and second transformation products derived from tomatoes, being geared at the national and international markets within the sector of the “Vegetable Preserves Industry”, creating value for shareholders, employees and society in general.

We are characterised by offering the customer a wide range of quality products, which stand out from the competition, and excellent service, to meet their needs and expectations.

- Vision:

To be leaders in the production of first transformation products derived from tomatoes, due to the quality of our products and the satisfaction of our customers.

To be present in the market of other products (agro-industrial, prepared food, etc.)

The CONESA Group, in line with its values, has accepted the challenge of undertaking to establish effective internal rules and procedures aimed at:

- Carrying out its activity in accordance with strict ethical rules and current legislation.
- Implementing performance standards and control and communication systems in order to prevent its activity from being used for illegal purposes.
- Ensuring that all employees adhere to policies and procedures regarding the prevention of unlawful acts.



The directors and employees of the CONESA Group shall monitor operations suspected of being illicit acts and shall immediately report them to the established internal bodies, in accordance with the specific policies and procedures, so that these, in turn, can inform the competent authorities.

Adherence to this policy is absolutely essential to ensure that all areas of the CONESA Group fully comply with current legislation. All employees of the CONESA Group are obliged to comply with these rules and regulations, and must therefore make them their own and become actively involved in their implementation and development.

Thank you in advance for supporting this Policy.

In Villafranco del Gadiana on June 01, 2021.

Signed by Manuel Vázquez Calleja.

CEO.

1. SCOPE OF APPLICATION.

This Code binds the following persons and entities:

- Members of the Board of Directors of Grupo Empresarial CONESA S.L. and the administrative bodies of all the companies belonging to the Group.

For these purposes, the concept of Group includes all those companies that are directly linked to Grupo Empresarial CONESA S.L. The name “the CONESA Group” refers both to the entity Grupo Empresarial CONESA S.L., as the parent company, and to the group of subsidiaries that this company heads.

- The members of the Management board of “the CONESA Group”.
- All employees who work in any of the companies that make up “the CONESA Group”.
- “The CONESA Group” and all its member companies, whatever the business scope or geographical location of these companies and their activities.

This Code binds the following persons and entities:

- Members of the Board of Directors of Grupo Empresarial CONESA S.L. and the administrative bodies of all the companies belonging to the Group.

For these purposes, the following companies are considered to be included in the concept of Group:

- Grupo Empresarial CONESA S.L.
 - Conservas Vegetales de Extremadura S.A.
 - Agraz S.A.U.
 - Roma S.L.
 - CONESA Vegas Altas S.L.U.
 - Tranformados Agrícolas del Bajo Guadalquivir S.L.U.
 - Algosur Pinzón S.L.
 - CONESA Portugal S.A.
- The members of the Management board of “the CONESA Group”.
 - All employees who work in any of the companies that make up “the CONESA Group”.
 - “The CONESA Group” and all its member companies, whatever the business scope or geographical location of these companies and their activities.

2. ETHICAL VALUES.

Executives and employees, both in the actions they carry out as a result of their relationship with the CONESA Group, and in any other actions in which it could be interpreted that they are attributable to the CONESA Group or could affect its reputation, must comply with the contents of the Code, which is based on ethical values, among which those that are key to the culture of the CONESA Group must be highlighted:

- **FOCUS ON RESULTS**, because results are essential for the continuity and growth of the company.
- **FOCUS ON CUSTOMERS**, with a vocation for service, since the satisfaction of our customers is our guarantee for the future.
- **COMMITMENT** to a job well done with reliability, prudence and seriousness with respect to the company, the work itself, people, customers and suppliers.
- **RESPONSIBILITY**, understood as the capacity we have to assume the consequences of our actions. We are responsible in our relationships with colleagues and customers.
- **EXEMPLARITY**, because the behaviour of each person, and especially that of the managers, is perceived by others and constitutes an important element of motivation.
- **HONESTY**, because we act according to what is expected of us as fair people, who comply with what has been agreed and who maintain the utmost respect for the principles and values that guide us.
- **TEAMWORK**, because the best way to achieve our objectives is through mutual support and the exchange of knowledge as a solution to common problems, in a climate of companionship and solidarity, strengthening us as people as well as a company.
- **DISCIPLINE**, understood as the ability to act in an orderly and persevering manner in order to achieve the established objectives.
- **RESPECT**, for all the people who work at CONESA, valuing and respecting (not interfering) the diverse functions and opinions that each one of us have, since this attitude allows us to generate confidence in ourselves and in others.
- **INFORMATION TRANSPARENCY**, we want everyone to feel informed about their work and the progress of the company.
- **INITIATIVE/INNOVATION/CREATIVITY**, because entrepreneurial attitudes, openness to

change and the ability to anticipate customer needs generate the progress of the company and the professional development of people.

- **RESPECT FOR THE ENVIRONMENT**, since we understand that environmental aspects are a strategic factor in sustainable development, we contribute to preserving natural resources as an essence for future generations.

Ensuring compliance with this commitment to ethical behaviour requires Responsible Care, which requires:

- Accountability in actions, both institutional and individual, strictly in accordance with the principles and criteria of the Code.
- Responsible attitude, which involves employees in the identification, immediate communication and resolution, where appropriate, of ethically questionable actions.

The CONESA Group considers that generalising the aforementioned ethical values and those implicit in the content of the Code to all types of business practices must contribute effectively to the development of the societies in which they are rooted.

3. RELATIONSHIP WITH AND BETWEEN EMPLOYEES.

The relationship between the CONESA Group and its employees, and between employees themselves, shall be based on compliance with the following commitments:

3.1. Respectful treatment and prohibition of discrimination, harassment or mistreatment in the workplace.

Treating employees with dignity, respect and fairness, taking into consideration their different cultural sensitivities.

Not discriminating against employees on the grounds of race, religion, age, nationality, sex or any other personal or social condition unrelated to their merit and ability.

Not allowing any form of violence, harassment or abuse at work.

3.2. Guarantee of labour rights.

Recognising the rights of association, unionisation and collective bargaining. The CONESA Group shall adopt an open attitude towards the activities of trade unions.

3.3. Prohibition of child labour.

The CONESA Group does not accept child labour. The CONESA Group will not use child labour or incorporate into its business activity any product or service derived from child labour and will ensure compliance with the provisions of the International Labour Organization (ILO) in relation to child labour. The CONESA Group requires all its employees and suppliers to strictly observe this principle.

3.4. Equal opportunities.

All employees will enjoy equal opportunities for career development. The CONESA Group is committed to establishing an effective policy of equal opportunities for its employees to develop their professional activity based on the principle of merit. Promotion decisions will always be based on objective circumstances and assessments. Likewise, the CONESA Group is committed to maintaining a policy of investment in the learning and personal and professional training of its employees.

The employees of the CONESA Group will respect the policy of equal opportunities in their professional environment and will support the personal and professional learning of their colleagues.

3.5. Health and safety at work.

The CONESA Group will provide its employees with a safe and stable environment and undertakes to permanently update the occupational risk prevention measures as well as to scrupulously respect the applicable regulations in this area in all the places where it carries out its business activities.

All employees are responsible for strict adherence to health and safety standards. They shall also make responsible use of their assigned equipment when performing hazardous activities and shall disseminate knowledge and promote compliance with hazard protection practices to co-workers and subordinates.

The CONESA Group shall ensure:

- That the development, training and career advancement of employees is encouraged.
- That the remuneration and promotion of employees is linked to their merit and ability.
- A fair wage, respecting, as a minimum, what is established in the collective bargaining agreement.
- A contract in accordance with the labour legislation in force at any given time for all workers.
- That health and safety is guaranteed at work, adopting all reasonable measures to maximise the prevention of occupational hazards.
- To try to reconcile work in the company with the personal and family life of the employees.
- The integration of people with disabilities or handicaps in the workplace, eliminating all kinds of barriers within the company for their integration.
- Facilitation of the participation of employees in the company's social action programmes.

4. RELATIONSHIP WITH THIRD PARTIES AND THE MARKET.

The CONESA Group and its employees shall base their relations with customers, suppliers, competitors and partners as well as with their shareholders, investors and other market players on the principles of integrity, professionalism and transparency.

4.1. Fair competition.

The CONESA Group prohibits any action that involves the exercise of unfair competition practices and undertakes to ensure compliance with the antitrust laws applicable in the countries where it carries out its activities.

The CONESA Group seeks commercial relationships based on the free market, which lead to the enhancement of its own values without undervaluing those of others, and which are always to the benefit of the interested parties.

We strive to maintain good relations with our competitors in order to share best practices to exchange experiences and improve the products and services offered.

4.2. Ethical trade.

The CONESA Group will seek to establish alliances and mutually beneficial relationships, based on trust, honesty, loyalty, knowledge sharing and integration in order to:

- Support suppliers, so that their supplies improve to the benefit of both parties.
- Create value between the parties and maximise it.
- Support mutual development.
- Ensure that the culture of both parties is compatible.

Transparency in relationships and fairness in treatment are fundamental values for our organisation.

When choosing suppliers, the CONESA Group undertakes to:

- Seek out and select 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 terms and quality.
- Seek excellence in the company's service, so that customers and consumers get the expected quality.
- Guarantee the company's products and services and to deal quickly and efficiently with consumer and user complaints, seeking their satisfaction beyond mere compliance with current regulations.

- Cooperate with the farmers who supply the raw materials to our factories to ensure that everything has been grown in a sustainable and environmentally friendly way.

All suppliers must show evidence that they comply with the conditions set out in this Code, in accordance with the procedures established by the Group
The CONESA Group.

4.3. Probity in management.

The CONESA Group prohibits bribery of authorities and public officials and prohibits its employees from giving to third parties or receiving from third parties undue payments of any kind, or gifts or favours that are outside the uses of the market or that, due to their value, characteristics or circumstances, may reasonably alter the development of commercial, administrative or professional relations in which its companies are involved.

4.4. Quality.

The CONESA Group establishes as a guideline for its business activities the search for quality in its products and will provide its employees with the necessary means for the development of the most appropriate quality management systems at all times. The CONESA Group will try to satisfy the expectations of its customers and will make an effort to anticipate their needs.

All raw materials used for the development of the CONESA Group's activity comply with the combination of requirements set out in the product specifications, the CONESA Group's policy and in this Code of Ethics.

The CONESA Group places its customers at the centre of its activity, in order to establish lasting relationships with them based on the reciprocal contribution of value and mutual trust.

The CONESA Group is committed to the continuous review of its organisational processes in order to improve the service provided to its customers.

4.5. Confidentiality with respect to third party information.

The CONESA Group guarantees respect for the confidentiality and privacy of the data of third parties in its possession. The CONESA Group undertakes to preserve the confidentiality of the data it has regarding third parties, except for any legal, administrative or judicial obligations that involve the obligation to hand them over to entities or persons or to make them public. Likewise, the CONESA Group guarantees the right of affected third parties to consult and promote the modification or rectification of the data when necessary. The employees of the CONESA Group, in the performance of their professional activity, will keep the confidentiality of the data in the terms set out above and will refrain from any inappropriate use of this information.

The CONESA Group considers that one of the main elements on which the trust of its customers is based is the appropriate safeguarding of their information and the effective limitation of its use in accordance with the provisions of the applicable legal provisions in each case.

The non-public information that the CONESA Group has about its customers and their operations is confidential. The CONESA Group has adopted standards and procedures in order to:

Guarantee the security of access to its computer systems and to the physical files in which its customers' contractual and transactional documentation is stored.

Comply with the legal requirements regarding the protection of personal data.

Employees, who by reason of their position or professional activity, have access to customer information, are responsible for its custody and proper use.

4.6. Transparency, value creation and corporate governance.

The CONESA Group assumes as a guiding principle of its business conduct towards its shareholders, investors, analysts and the market in general, to transmit true and complete information that expresses a true and fair view of the company and the Group, its business activities and its business strategies.

The communication will always be made in accordance with the rules and deadlines established by the legislation in each case in force. The business actions and strategic decisions of the CONESA Group will be focused on the creation of value for its shareholders, transparency in its management, the adoption of the best Corporate Governance practices in its companies and the strict observance of the regulations in this area that are in force at any given time.

The CONESA Group is committed to providing its customers with timely, accurate and understandable information about its operations, as well as clear and truthful information regarding:

The fundamental characteristics of the products and services offered or supplied by the CONESA Group.

The procedures established in the Group to channel their complaints and resolve incidents.

This commitment requires special diligence in the professional performance of all persons with responsibility in the maintenance of the processes and information systems for customers, in the personal attention of their requests for information and in the resolution of their complaints.

4.7. Protection of corporate assets.

The CONESA Group and its employees will always seek the best protection of all assets and rights that constitute the assets of the companies of the group, preserving the confidentiality of the information relating thereto, which may only be used in relation to the activities of the company. Employees are responsible for protecting the assets of the CONESA Group entrusted to them and preserving them from any loss, damage, theft or illegal or dishonest use.

4.8. Conflicts of interest.

All employees of the CONESA Group must avoid situations that may involve a conflict between their personal interests and those of the CONESA Group and refrain from representing the company or intervening in or influencing decision-making in which, directly or indirectly, they or a third party linked to them by any significant economic, family or professional relationship has a personal interest.

Employees who find themselves in a situation of conflict are obliged to report it to their line manager. Conflicts between personal interests and business interests shall always be resolved in the best interests of the CONESA Group companies.

4.9. Use of information regarding the CONESA Group.

The CONESA Group requires its employees to make discreet and professional use of the company's information to which they have access in the course of their work and to limit its use to the company's own activities, and undertakes to establish management systems focused on respecting this principle.

5. RELATIONSHIP WITH SOCIETY.

5.1. Relations with public administrations.

The CONESA Group, regardless of complying with all tax, labour and regulatory obligations established by the laws in force, will be ready at all times to satisfy requests for information from public administrations, national or foreign, regardless of the administrative level from which they originate, providing them with the required promptness and detail, maintaining at all times a collaborative and respectful relationship.

The CONESA Group will always maintain the principle of political neutrality, although it will participate, directly or through business organisations, in the drafting of laws, regulations or other rules that could affect its legitimate interests.

5.2. Environment.

The CONESA Group assumes the commitment to ensure the greatest respect for the environment in the development of its activities as well as to minimise the negative effects that, eventually, these could cause. It will make available to its employees the most appropriate means for this purpose and will listen to local communities when making decisions that affect them and the consequences that may arise for the development of future generations.

The CONESA Group will also contribute to the conservation of natural resources and those areas of ecological, scenic, scientific or cultural interest. To this end, it will establish best practices and promote knowledge and use of them among its employees. The CONESA Group is committed to strict compliance with the applicable environmental legislation.

5.3. Social commitment.

The CONESA Group is committed to acting in a socially responsible manner, in compliance with the laws of the countries in which it operates and, in particular, assumes responsibility for respecting cultural diversity and the customs and principles in force among the people and communities affected by its activities.

6. INTERPRETATION AND ENFORCEMENT.

This Code establishes the principles and commitments of business ethics that the CONESA Group and its employees must respect and comply with in the exercise of their activities.

Any employee who has knowledge or a well-founded suspicion of a breach of this Code may bring it to the attention of their superior or report it through the mechanisms established by the company for the formulation of suggestions and complaints. The CONESA Group will take the necessary measures to avoid adverse consequences as a result of communications made in good faith by employees as provided herein.

Violations or non-compliance with this Code which constitute a labour misconduct will be sanctioned in accordance with the regulations in force, without prejudice to any other responsibilities that the offender may have incurred.

In order to ensure compliance with this Code, resolve incidents or doubts about its interpretation and adopt the appropriate measures for better compliance, an ethics mailbox has been created, open to employees and other stakeholders, via e-mail.

canal.etico@conesagroup.es

This channel includes mechanisms to guarantee the confidentiality of the information and the protection of the reporter from retaliation.