CODE OF CONDUCT AND ETHICS

VERSION 3.0

CODE OF CONDUCT AND ETHICS

INTRODUCTION

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1. INTRODUCTION

This Code of Conduct and Ethics is the formal guide reflecting the principles, values and basic moral and ethical fundamentals which should guide the actions of Juver Alimentación, S.L.U. (Hereinafter "Juver Alimentación" or "Juver") and all of the people who comprise it.

1.1 Objective

The aim of this Code is to establish principles and general guidelines of conduct to guide the actions of the business during the performance of the professional activity of all the people who make up the Company, ensuring at all times compliance with current legislation.

1.2 Development

Juver Alimentación is committed to promoting the widest possible dissemination of this Code to all relevant persons, and providing them with sufficient tools to promote its implementation.

Honesty is the fundamental principle governing the activity of Juver's work. This is why, in cases in which the activity is not subject to any laws, regulations or other obligations, the guiding principle for conduct should always be honesty.

The Company expects every person to use good judgement in their actions and ask for advice whenever there is any query regarding behaviour to their supervisor, and where required to the Compliance Office (ORCN), where the matter will be discussed and resolved.

1.3 Recipients and scope of application of the Code

Juver's Code of Conduct and Ethics applies to all staff of the Company, regardless of the position they hold or the place in which they carry out their work, and is binding to all workers, partners and administrators of Juver Alimentación, without distinctions or exceptions. Therefore, it is mandatory to comply and to respect the principles and behaviours described below.

GENERAL PRINCIPLES

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2. GENERAL PRINCIPLES

Juver's Code of Conduct and Ethics is structured based on the following principles:

2.1 Respect for the law and applicable regulations

Juver undertakes to act at all times in accordance with current legislation, with full respect for human rights and public freedoms, rejecting child labour and, in general, any form of exploitation.

All staff of Juver must avoid any conduct that, even without violating the law, may be detrimental to the reputation of the Company or the Group; and must act with honesty and integrity in all their interactions and transactions, in accordance with the laws that affect their work.

No staff member shall knowingly collaborate with third parties in violation of any law.

2.2 Respect for people

Juver is committed to maintaining a comfortable, healthy and safe working environment to ensure the physical and moral integrity of its workers. It also rejects any manifestation of physical, psychological or moral assault or abuse of authority, as well as any other conduct that could create an intimidating or offensive environment within the rights of persons, for reasons of race, religion, politics or trade union, nationality, language, sex, marital status, age or disability.

2.3 Reconciliation of personal/family and working life

Juver considers the holistic development of persons to be essential, and is committed to continue working for the welfare of its staff, encouraging measures to achieve a balance between the family/personal and professional responsibilities of its employees.

2.4 Health and safety at work

Juver promotes the adoption of policies on health and safety in the workplace by adopting preventive measures as established in current legislation, with the aim of achieving a high level of safety in its facilities and services.

In addition, it promotes the application of its rules and policies on health and safety at work with partner companies and suppliers with whom it operates.

Juver provides its staff the resources and knowledge needed to be able to carry out their duties efficiently, safely and in a healthy environment.

2.5 Selection, remuneration and professional development

The process of staff selection and promotion at Juver will always be done on an honest and fair basis, and will be based on the skills and performance of professional duties as defined in the requirements of the position, respecting the principles of impartiality and equality of opportunities for all parties involved.

On accepting the contract, the hired staff member will receive the information pertaining to the tasks and functions of the position they will fill, meaning that acceptance of the contract is based on an effective understanding of the position and conditions.

Should the possibility arise, internal promotion of staff is preferred, provided that they fit the professional profile required (necessary skills and abilities) for the position.

2.6 Respect for the environment

Preservation of the environment is one of the basic principles of Juver.

Being aware of the influence that its activities may have on the environment, protection of the environment is a major concern, and it is committed to respecting the environment and complying with all relevant regulations.

To this end, it has defined and implemented an environmental management system that covers waste management, energy expenditure, natural resource consumption, water consumption and wastewater discharges, air emissions, noise emissions, and environmental actions, with plans and programs in place to prevent, control and reduce the impact of its activities.

Juver is committed to minimising its environmental impact throughout the life cycle of its products up to their final disposal, developing at each stage of the process of design, manufacture, distribution, sale and use, measures to reduce and compensate for this impact.

GENERAL GUIDELINES OF CONDUCT

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3. 3.GENERAL GUIDELINES OF CONDUCT

The Code of Ethics determines specific guidelines for conduct that must be adhered to and respected by both staff members of Juver as well as any partner companies.

3.1 Corruption, bribery and influence peddling

Juver is opposed to any attempt to influence the will of people inside or outside the company in order to obtain some benefit through the use of unethical practices, and will not allow other persons or entities to use such practices within its staff.

Juver employees cannot accept or offer, directly or indirectly, any gifts, remuneration, promises or compensation that supposes an improper influence on commercial, professional or administrative relations.

3.2 Conflict of interest

Juver considers loyalty to be an essential value, one which is also compatible with the possibility that employees may carry out other business or professional activities as long as they are legal and do not conflict with their responsibilities as employees.

As such, they will refrain from representing the Company, intervening or influencing any decision making in matters which, directly or indirectly, they themselves, their relatives or associates, have personal interest.

3.3 Gifts, freebies and benefits

Gifts are only permitted when delivered or received as part of a commercial practice or generally accepted courtesy public use, consisting of objects or hospitality with a symbolic or financially insignificant value, that does not influence any business decisions, as well as those offered on specific dates, the aim of which is only to maintain good business relationships.

In the event that the gift or freebie does not comply with the prescribed parameters, it should be refused or, where appropriate, returned, in such a way that it does not pose a serious offence to the offerer.

In case of doubt, employees should consult with their immediate supervisor, or where appropriate the Compliance Office.

3.4 Irregular Payments / Charges

Juver does not condone any lack of integrity in the persons or entities with which it carries out its business, and therefore will not allow any payments or charges not set out in agreements, or any kind of unusual payment under conditions that differ from those established in agreements or contracts, or any activity related to money laundering.

In case of any doubt, or observation of cases of irregular payments, employees must first inform their immediate supervisor, and where appropriate, the Compliance Office.

3.5 Business and financial records. Tax Obligations.

Juver Alimentación ensures the accuracy and transparency of the information contained in its accounting records, and in the management of its balance sheet and profit and loss account; as well as all the information necessary for its operation, in accordance with the provisions of the Law, and current principles and technical standards.

Documents and records shall at all times be at the disposal of internal/external auditors, in accordance with the principles outlined above.

Juver Alimentación expressly prohibits any practice involving the illegal circumvention of tax or duty payments to the detriment of state, regional, provincial or local Public Finance, or any other administrative entity, so such practices should be avoided at all times.

3.6 Quality and safety of products

Juver's mission is to make healthy and tasty products designed to meet the needs of the consumer. To achieve this, Juver works to offer quality products, pledging to abide by all applicable laws, utilising all controls necessary to ensure consumers the highest food safety and quality, with a commitment to continuous improvement of products in accordance with new technologies.

3.7 Advertising

Any information conveyed to the public shall be true, clear, accurate and honest according to the principles of fair competition and good business practice, free from any elements that might lead to an erroneous interpretation of the characteristics of the products and services, so that they do not mislead in any way.

EXTERNAL RELATIONS

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4. EXTERNAL RELATIONS

In the process of its activities, Juver establishes relationships with other individuals, companies, organisations and public and political institutions, always following the principles of respect that govern this Code.

4.1 Relations with partner companies and suppliers

Customer Relations

Juver's attitude to dealing with its customers is always focused on availability, respect and courtesy, with a collaborative relationship and high professionalism.

Contracts and communications with Juver customers (including advertising messages) are clear and simple, compliant with current legislation, without resorting to elusive or improper practices; complete in such a sense that they do not fail to disclose any element relevant to the customer's final decision.

Relationships with suppliers

Relationships with suppliers should be based on a criteria of honesty. In each case, selection of suppliers and decisions on conditions of purchase are stipulated based on objective parameters, such as quality, convenience, price, capacity, efficiency of services and the products on offer, while also ensuring the integrity of their business practices together with socially responsible, ethical actions and respect for the law.

4.2 Relationships with competitors

Juver undertakes to promote free competition for the benefit of consumers and users. It declares its commitment competition while acting in a legal and loyal manner, complying with the rules of competition, while respecting the rules of the free market, and avoiding any conduct that constitutes or may constitute collusion, abuse or restriction of competition.

4.3 Relations with organizations, institutions and public bodies and authorities

Community

Juver is aware of the effects of their own activity within a frame of reference, in the economic and social development and general wellbeing of the community, and ensure that the interests of Juver are reconciled with those of the community/environment.

Relationships with non-profit organisations

Juver is in favour of and contributes, where appropriate, to activities of non-profit organisations, with product donations, opting for redistribution of production surpluses (if any) for the poor and marginalized.

Media relations

Las relaciones con la prensa, los medios de Relationships with the press and other media must fall to and be reserved to General Management, who will manage such relations in accordance with the policies adopted by the company.

Exterior communications follow the guiding principles of truth, correction, transparency and prudence, and aim to promote the knowledge of company policy, programs and projects.

Workers, partners and administrators cannot provide information to other parties, nor undertake to do so, without the authorization of the General Management.

Relations with public institutions/administration

Relationships with public, local, national and international institutions and administrations should be based on criteria of maximum transparency and correctness, accuracy and consistency. Such relationships must be performed and managed in the most absolute and rigorous accordance with the law and current legislation, the principles defined in the Code of Conduct and Ethics, in such a way that the integrity or reputation of either party shall not be compromised.

To this end, any obligations with Public Administrations and Institutions are reserved exclusively for persons authorised by the management.

By participating in recruitment tenders, Juver adopts behaviours focused on the principles of good faith, transparency, professional conduct, loyalty and legality in dealing with the public entity and other participating subjects.

INFORMATION MANAGEMENT

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5. INFORMATION MANAGEMENT

5.1 Transparency and complete information.

Juver Alimentación favours a continuous and complete flow of information between the various business areas, the Management, the different chains of command and the Compliance Office.

In any case, information transmitted both externally and internally from the organisation must comply with the requirements of truthfulness and transparency.

5.2 Privacy of information

Juver Alimentación and its workers must ensure the confidentiality/privacy of information that is in its power and the observance of the rules on data protection.

Staff who, for whatever reason, access information of corporate interest, are in no way authorised to disseminate or use such information outside the purposes for which they have been granted permission by company management.

5.3 Use and protection of property and assets

All employees of Juver Alimentación are expected to act responsibly with care and attention for the company's assets against loss, damage, misuse, theft, fraud, embezzlement and destruction of the same. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or privileged information and computer systems.

5.4 Intellectual and industrial property

Juver is committed to the protection of intellectual and industrial property, both its own and of others, and works to ensure scrupulous respect for the rights of copyright, patents, trademarks, domain names, designs and technical expertise. Only duly authorized trademarks, images and texts shall be used in advertising.

The intellectual and industrial property that comes as a result of the work of employees during their tenure in the company, and that is related to the present and future business, shall be the property of Juver.

COMPLIANCE WITH CODE OF CONDUCT AND ETHICS

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6. COMPLIANCE WITH CODE OF CONDUCT AND ETHICS.

The guiding principles and criteria contained in this Code of Conduct and Ethics are mandatory for its recipients.

To guarantee the implementation of the Code, the company has created Compliance Office to ensure Follow-through and compliance with the Code, promoting its contents and interpreting its rules, as well as resolving any doubts or queries that may arise.

6.1 Composition of the ORCN

The Compliance Office shall be composed of the following members of the company:

- General Manager
- Management Control Representative
- Human Resources Manager
- Operations/Manufacturing Manager

6.2 Reporting

Any employee who has concerns regarding the implementation of the Code who has observed a situation that could lead to a breach or violation, or suspected breach or violation, of any of the ethical principles and standards of conduct set forth in this Code, shall inform their immediate supervisor and, if applicable, the Compliance Office, acting within the scope of their functions by resolving any reports that may arise from non-compliance with the Code.

The communication system in this regard is defined in the INTERNAL INFORMATION SYSTEM policy and the procedure for the management of information received in the Internal Information System, which is published on the Company's website.

6.3 Policies and procedures

This Code contains general principles and guidelines of conduct that must be understood and complied with by all employees of Juver Alimentación in the carrying out of their work.

There will also be made available to Juver staff, through the virtual portal, a series of specific Policies and Procedures that complement the Code of Conduct and Ethics that all employees must understand and accept:

- Quality, environmental and food safety policy
- Equal opportunities policy.
- Protocol for the prevention and treatment of moral and sexual harassment in the workplace.
- Health and safety in the workplace policy.
- Computer use protocol.
- Disciplinary regime.
- Protocol of powers
- Internal Information System Policy and the procedure for the managment of information received.

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