



RSE-03  
**ETHICAL CODE**

**FRINSA GROUP**

*Version 4.3 - July 2022*

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**I. INTRODUCTION**

At Frinsa del Noroeste, S.A. and its participated entities (from here, “**Grupo Frinsa**” or “**Frinsa**”) we are conscious of the impact that our activity has on people and the environment, both at the local and global levels. It is because of this that we consider it necessary to embark on a series of actions to control this impact, minimize its possible negative effects, and contribute to the effective improvement of the surroundings which we influence, whether directly or indirectly.

The Frinsa Ethical Code summarizes the commitments that we have acquired on social ethics, the respect for the environment and the sustainability of the resources, and defines our commitment as a Grupo to society, people and the environment.

We also work on the propagation of these values throughout the supply chain by spreading our Code of Conduct for Suppliers, as we consider that all participants in the chain are responsible for assuring compliance with ethical values and the respect of human rights.

The Ethical Code aims to establish an inspiring and regulating framework that will invite exemplary and professional excellence, and foment the commitment and responsibility of Grupo Frinsa employees. The implementation of the principles described in the Code aims, as an objective, to achieve an ethical and integral organizational culture, oriented more towards excellence than towards compliance with individually established rules.

The **principal references** of our Ethical Code are:

As external references that correspond to international initiatives that constitute a global ethical framework:

- The International Labor Organization Conventions
- The 10 principles of the United Nations Global Compact
- The Universal Declaration of Human Rights
- The Base Code of the Ethical Trade Initiative (ETI)
- The Organization for Economic Co-operation and Development
- The OECD Guidelines for Multinational Enterprises
- The Objectives for Sustainable Development

Additionally, the present Code sustains itself on the **principal internal policies of the Grupo**, which are the following:

- Code of Conduct for Suppliers
- Quality, Environmental and Sustainable Development policy
- Sustainable Development policy
- Company Ethics and Anti-corruption policy
- Equality Plan
- The Grupo Frinsa values that are described as follows:

[www.grupofrinosa.com](http://www.grupofrinosa.com)

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## II. COMMITMENT TO THE INTEREST GROUPS

The present Ethical Code aspires to reach all the interest groups that interrelate at Grupo Frinsa:

- **Professionals:**

Employees, management and professional collaborators must know its content and force themselves to comply at the moment of their incorporation into (or collaboration with) Grupo Frinsa, and during their permanence in it (from here, the “**Professionals**”).

The management team strives to create a conscience about this ethical conduct, and creates the necessary tools, such as this Ethical Code, to capacitate everyone to consolidate the culture and fight for excellence in our Grupo.

From its end, Grupo Frinsa guarantees the equality of opportunities, the health, security and job-respect to its Professionals.

- **Clients:**

Grupo Frinsa is oriented to the full satisfaction of its clients and a collaborative work with them, to address their demands and offer them products of the best quality.

Grupo Frinsa guarantees the safety and quality of its products to its customers, complying with the legal dispositions, regulated and internally established, to comply with the principles of food safety.

- **Suppliers:**

Grupo Frinsa determines the commercial relationships with its suppliers with full respect of human rights and working conditions, the environment and ethics. Also, Grupo Frinsa requires its suppliers to commit themselves to take measures against corruption in all its forms and to adopt the best practices in their company development.

- **Shareholders:**

Grupo Frinsa supplies regular and transparent information regarding the activities, strategy, yield, perspectives and the financial characteristics of the Grupo to evaluate the company's situation.

- **Public Administrations:**

Grupo Frinsa pushes itself to establish exchanges of information and documentation based on honesty and integrity and, in particular, guarantees the strict compliance of the laws against corruption, and regulations such as the OECD Convention, the Law of Corrupt Practices Abroad (United States), the Bribery Law (United Kingdom), in the measure that they are applicable to the activities of the company. In Spain, Law 19/2013, of 9 December, on transparency and good governance.

## III. OUR VALUES

### 1. Respect of valid law and business ethics

All Professionals of Grupo Frinsa will scrupulously respect the valid legal norms applicable in the territories where these persons act in their professional scope.

To this effect, no order that contravenes current legality will be obeyed, establishing in this present Ethical Code the communication channels to resolve this contingency.

Ethical acts must cover the professional as well as the personal activity of the persons that comprise Grupo Frinsa, being Ethics a fundamental pillar in which our operating mode, and the manner of understanding the market, are based.

## **2. Honesty and integrity**

These principles commit us to perform our jobs with honesty, dignity, good faith, coherence and respect; guaranteeing the physical and moral integrity of the Professionals that make up Grupo Frinsa, as well as those of its collaborators.

Being convinced that honesty guarantees better working conditions and, therefore, an improvement in the results of our work, in our Grupo cheating and unjust advantage have no room.

Responding affirmatively to these premises with professional acts, we will be, without a doubt, acting in an honest and integral manner that will be legally valid, ethically acceptable, desirable for Society and Grupo Frinsa, and for which we'll be ready to assume responsibility.

## **3. Diligence and responsibility**

Only from a personal responsibility can work be well done, only with diligence will we have the optimal results we seek.

## **4. Respect for human and labor rights**

Grupo Frinsa manifests its commitment to, and defense of, human and labor rights recognized in the national and international legislation, and to the principles upon which the United Nations Global Compact is based, the norms regarding the possibilities of transnational companies and other commercial businesses in the sphere of human rights of the United Nations, the Base Code of the Ethical Trade Initiative, the OECD guidelines for multinational enterprises, the tripartite declaration of principles regarding multinational companies and the social policy of the International Labor Organization, the European Alliance for social responsibility, as well as documents or texts that may substitute or complement the ones here previously mentioned.

Specifically, Grupo Frinsa assumes the following commitments:

1. Prohibition of forced labor
2. Prohibition of child labor
3. Policy of no discrimination and equal treatment
4. Respect for freedom of association and collective bargaining
5. Guarantee of hygienic and safety conditions
6. Just remuneration and benefits
7. Full respect for the legality of working hours

## **5. Focus on excellence**

The *raison d'être* of Grupo Frinsa must be found in the quality of our products and the satisfaction of the clients. The improvements in the supply of the products must lead the way, the search for excellence in what we do is the objective we strive for, and it is the fundamental pillar upon which the rest of our values support themselves.

## **6. Environmental protection and respect for local development**

Grupo Frinsa is committed to a sustainable development that contemplates, as its principal objectives, the protection of the environment, social cohesion and the respect for local development.

In this sense, we are fully committed to complying with the environmental legislation of national and international scopes.

We work to prevent and reduce contamination by means of risk analysis and the adoption of adequate prevention measures.

We are obliged to minimize the impact of our activity in the surroundings by means of an impact evaluation study and the optimization of processes using the best technologies available.

We will make sure that no human habitat or coastal area is illicitly transformed or re-zoned to favor the interests of particulars or private business in detriment of the community.

## **7. Sustainability of the resources**

We guarantee the origin, sustainability and legality of the raw materials, in accordance with the current European legislation.

Regarding fishery products, we comply with the current EU legislation requirements in relation to illegal, undeclared and unregulated fishing (IUU).

Our tuna suppliers must comply with the *Dolphin Safe* criteria, and figure in the positive lists of *Dolphin Safe* companies published by the Earth Island Institute. Besides, the suppliers must deliver raw materials or finished products that meet the commitments and conservation measures promoted by the International Seafood Sustainability Foundation (ISSF).

Our suppliers of fishery products, when applicable, must have a policy against shark finning, and make it public.

## **IV. RESPONSIBILITY UNDER THIS ETHICAL CODE AND ITS COMPLIANCE**

This Code's objective is to develop guidelines for a professional, ethical and responsible conduct that must guide, in their professional endeavours, all persons that make up Grupo Frinsa. The Code is applied to all Professionals of Grupo Frinsa, who must know its content, and this with independence of the contracted method that may determine their work relationship, the position they occupy or the geographical area where they may perform their duties.

The Professionals of Grupo Frinsa accept and assume the obligatory character of the behavioral norms established in the Ethical Code.

As a multinational group, Grupo Frinsa is subject to several legislations, some of which are applicable in more than one country. By following the principles described in this Code, you are already helping Grupo Frinsa to comply with these laws.

By means of this Code, protocols of application, control and follow-up are established to guarantee its compliance.

### What must I do if I am not sure of how to apply the Code?

This Code cannot contemplate all situations that you may encounter in your daily activities that may pose a legal or ethical problem. If you have a question for which you do not find an answer in this Code, and, in a more general way, for any consultation related to this Code, you can always reach out to the Ethical and CSR Committee.

### What must I do if I consider that someone is acting improperly?

If you have serious doubts that the action of an employee or third party violates this Code, we urge you to report it.

In these cases, you may contact a hierarchical superior or the Ethical and CSR Committee. Consult the more detailed description of the alert and report system in the section "Ethical Reporting Channel", included in the present Ethical Code.

Grupo Frinsa is committed to protect the people that try, in good faith, to discourage bad conducts. These matters will be addressed with the maximum confidentiality. We will not accept any act of reprisal or discrimination against an employee who may have revealed a conduct believed to be in violation of this Code or the law.

### Who is responsible for the compliance with this Code?

We are all responsible for compliance with this Code.

The Human Resources Department, along with the [Ethical and CSR Committee](#), are responsible for the implementation, diffusion and training of the Code to the Professionals and interest groups. The Ethical and CSR Committee will also advise people regarding any consultation related to it.

The Ethical and CSR Committee is responsible for supervising this Code and must suggest to the Grupo Frinsa management any change that may be necessary following legislative developments, or to best protect the interests of Grupo Frinsa.

### The Ethical and CSR Committee

The Ethical and CSR Committee is a collegiate body of an internal and permanent character, constituted to preserve and guarantee the Grupo Frinsa business ethic.

The Ethical and CSR Committee will be in charge of:

- Promoting the Ethical Code between Frinsa Professionals and collaborators.
- Receiving and analyzing communications and reports related to non-compliance with the Ethical Code.
- Reviewing the efficacy of the internal controls of Grupo Frinsa that guarantee compliance with the Ethical Code.
- Addressing questions and doubts regarding the present Ethical Code and, in general, any questions relative to the business ethics.
- Studying the policies of the Grupo, guaranteeing their coherence with the Ethical Code.
- Making decisions relative to the consequences in the case of some non-compliance and/or infraction of the Ethical Code.
- Updating the internal policies of Grupo Frinsa to guarantee the constant commitment to the defense of universal ethical principles.

## V. PRINCIPLES OF CONDUCT

## 1. Respect of people

**The Grupo is committed to the promotion and maintenance of a stimulating, creative and non-discriminatory work environment for all Professionals, respecting the diversity and dignity of all persons.**

In order to improve its talent and develop the motivation and performance of its Professionals to guarantee the innovation, the corporate image and the competitiveness, Grupo Frinsa:

- **is committed to fomenting a culture of respect** as an indispensable condition for an interpersonal relationship of conviviality. The employees must treat each other with respect and courtesy, propitiating an agreeable workplace. All collaborators have the obligation of treating their colleagues, their superiors and their subordinates in a respectful manner.
- **is committed to promoting diversity** in its organization and recognizes the differences among its Professionals as an indispensable wealth to the success of an international company.
- **promotes equal opportunities** for each employee, keeping in mind the potential of each candidate in terms of hiring, access to training, remuneration, social protection, internal movility and professional development.

Grupo Frinsa has an equal opportunity policy to guarantee the integration and compliance of these criteria in the organization's culture.

- **prohibits any form of discrimination based on:**
  - gender
  - age
  - religion
  - sexual orientation
  - physical appearance
  - state of health
  - disability
  - trade union affiliation
- **prohibits any form of conduct that may attack the dignity of a person** and, in particular, any bullying of any type and abuse of power. Grupo Frinsa commits itself to promoting a healthy work environment and one of support for all its employees.
- **conciliation of professional and personal lives:** Grupo Frinsa, in its commitment to people, respects the personal lives of its Professionals and promotes the flexibility and measures of conciliation that facilitate the balance between the work-related responsibilities and the personal and family life of the Professionals.
- **responsible use of the resources for the development of the professional activity:** the material resources and installations that the company puts at the service of the Professionals for the performing of their duties are property of the Grupo, and in no circumstance will be used for other ends, unless specifically authorized. The Professionals and managers must make responsible use of the resources made available to them, and take care of them and their conservation.
- **stake on the growth of the people in the Grupo:** Frinsa promotes the training of its Professionals, betting on their professional development and the acquisition of new capacities and competences. The Professionals must be committed to the objective of

constant growth through training and a quality personal development, participating in those programs that the Grupo may offer them and taking advantage of them.

## 2. Respect for Hygiene, Safety and Food Safety

**Grupo Frinsa is committed to guaranteeing the safety and health of the workers, as well as optimizing the safety of the installations and Food Safety.**

Grupo Frinsa applies a strict program of Health and Safety in the workplace. The Professionals in Frinsa must observe the norms relative to safety and health at work, with the objective of preventing and minimizing labor risks. To this effect, Grupo Frinsa applies a series of specific measures in the framework of this safety and labor-risk prevention policy, and commits to:

- Take the measures required by legislation to safeguard the safety, health and physical and psychological integrity of the workers and of all persons related to the Grupo in the short, middle and long terms; this means evaluating and controlling the physical risks inherent to the physical activities developed by the Grupo. The Human Resources Department also commits itself to train the workers affected by these matters so that they may be conscious of their active role and their responsibility in the prevention of accidents;
- In the matter of food safety, Grupo Frinsa is ruled by the principle and procedures established in its Quality Policy. Grupo Frinsa has a confidential information system that allows the personnel to communicate problems related to the safety, integrity, quality and legality of the product.

## 3. Respect for privacy and the protection of personal data

**The protection of personal data: a fundamental right that guarantees people their right to privacy.**

Grupo Frinsa scrupulously respects the right to intimacy of its Professionals in all its manifestations, and, specially, what is referred to as the data of a personal, medical and economic nature. This type of information of a non-public character is considered reserved and confidential, so the necessary mechanisms are put in place for its adequate handling and to preserve its integrity and confidentiality.

Grupo Frinsa manifests its compliance with the current legislation in matters of data protection in each of the places where it performs its activities, and establishes concrete measures in matters of Confidentiality, Data Protection and Intellectual Property. In this way, it is committed to not divulging data of a personal nature of any of its Professionals and Collaborators, except with the consent of those concerned and in case of a legal obligation or in compliance with judicial or administrative resolutions, and it will only be on file during the time necessary to address the matters in question.

## 4. Confidentiality and protection of sensible information

Any information that is not public must be protected, even in the absence of a formal secrecy obligation, be it referring to Grupo Frinsa, its Professionals or third parties.

It is considered **confidential** all information of a sensible character that is not of public domain, and any other whose divulging may cause damages to any of the companies that make up Grupo Frinsa. Also, it will be considered as confidential the information relative to third parties that the Professionals may have knowledge of due to their relationship with the company.

All information is considered property of Grupo Frinsa and it is subject to **professional secrecy**, and the protection of it is an obligatory commitment for all the Professionals that work at the company, who are required to perform their activities following the confidentiality procedures established.

The competitive edge of Grupo Frinsa is based, above all, on sensitive information of a scientific, technical or commercial character. This information is of great value to the company and its clients.

The accidental disclosure may affect not only the Grupo's competitiveness, but it can also be a source of disloyal or malicious competition.

Therefore, the necessary measures must be taken to guarantee its protection, in any of its forms, as well as its safe storage. Further, the diffusion of this information may constitute a violation of the confidentiality adopted by the Grupo with regards to third parties.

The Professionals will not use the information at their disposal for other means beyond those that, for reasons due to their work or professional activities, justify their access to it, nor to obtain advantages or personal benefits.

So, it is necessary to guarantee the protection of this sensitive information and consider carefully any situation in which there may be a pretension to disclose it outside the Company, even in the context of commercial relationships already established with third parties.

## **5. Preservation of the corporate identity and reputation**

Grupo Frinsa is firmly committed to the preservation of its image and reputation, especially as it refers to the professional or individual use by its Professionals of the communication tools accessible through internet.

Only the authorized Professionals may communicate about activities and products in the name of Grupo Frinsa.

The Grupo Frinsa Professionals must use social media in a responsible manner, making clear in their Social Media profiles that their comments and opinions are of a personal nature and never in representation of the Grupo. Any comment that could damage the image or reputation of the Grupo may incur in legal responsibilities.

The Professionals commit themselves to make responsible use of the computer systems and, in general, of any other means that Frinsa may place at their disposal. Said means are made available for professional use and are, therefore, not apt for private communication; it is thus informed that the expectation of privacy does not exist in the case where it may result in supervision by Frinsa in the proportional performance of control duties.

The usage of files or programs of an external origin may entail grave risks to the security of Frinsa, or constitute an infraction of the Intellectual Property if the corresponding license or authorization is not obtained. For these reasons, the use of non-authorized software and downloadings that may entail a risk of introducing a virus or any other dangerous element to computer safety in the Frinsa network are prohibited.

## **6. Prevention of conflicts of interest**

In their professional duties, our Professionals and collaborators must search for **impartiality and objectivity**, permanently looking out for the interests of Grupo Frinsa. If, in particular situations, a case of conflict of interest arises between Grupo Frinsa and the Professional, this one must abstain from performing any activity or making any decision, and will communicate the matter to a hierarchical superior or to the Ethical and CSR Committee, which will give the Professional a solution, always counting with his cooperation.

They will be understood as conflicts of interest those situations in which the personal interests of a Professional or collaborator could be in conflict with those of the Grupo. The personal interests must



be understood in the wide sense of the term, as they refer both to the interests of the worker and those of any other physical or judicial person in his/her surroundings.

- **Gifts and other non-symbolic benefits\***

When we refer to people that collaborate, or wish to collaborate, with the Grupo, this type of practice can also lead to conflicts of interest and be characterized as acts of bribery. In fact, such an action may give the receiver the sensation of being responsible and, thus, make him/her doubt the objectivity of his/her decision.

The Frinsa Professionals cannot accept, directly or indirectly, gifts or attentions from clients, suppliers or third parties in general for a value superior to EUR 150.

When the presents exceed this value, the Professionals must inform the director of the Human Resources Department or the Ethical and CSR Committee so that a decision may be taken in consequence about the return of the gift or the use that may be given to it.

In no case will compensations or gifts be accepted with the object of influencing in an improper manner the professional or commercial relations, even if the value of these gifts is inferior to the established amount.

(\*) The symbolic character is evaluated in each country on the basis of the legislation, the culture and the economic surroundings.

## **7. Respect for free competition**

Grupo Frinsa rejects any conduct of illicit and disloyal competition, avoiding any conduct that constitutes, or may constitute, abuse or restriction of competition.

Grupo Frinsa and its Professionals are committed to comply with the current legislation regarding these matters, which, in the case of Spain, corresponds to the Law 15/2007, of 3 July, of the Defense of the Competition, as well as establishing relationships based on the respect, understanding and cooperation with the competitors.

The violations of the anti-monopoly and disloyal competition laws are penalized with fines and damages for the Company and the individuals involved. Besides, in some countries the grave violations, such as illegal price-fixing agreements or the distribution of markets between competitors, are penalized with prison sentences.

The problems of competition may arise from the contacts that Grupo Frinsa has with its competitors, as with the relationships with suppliers and clients.

Specifically, the contacts with competitors known as “horizontal agreements” are prohibited by Frinsa, especially as they refer to:

- prices: tariffs, price setting methods, discounts, promotional conditions and invoicing, margins;
- information about products: marketing projects and strategies;
- production: industrial capacity, logistics and product quality;
- market distribution: by geographic area or client, or by product;
- financial information: costing of the goods and services purchased or manufactured, benefits, margins; participation or not in a bidding;
- agreements or contracts with suppliers or clients.

In what is relative to relationships with suppliers and clients, referred to as “vertical agreements”: in the context of the relationships both with suppliers and clients, any application of discriminatory or

boycott practices constitute, in the majority of countries, a violation of the norms of competition rights.

## **8. Fight against acts of corruption and illegal payments**

### **Grupo Frinsa is committed to eradicate corruption in all its forms.**

In all countries where it operates, Grupo Frinsa is firmly committed to the fight against corruption in all its forms. For this reason, it has established a strict [Anti-corruption and Ethical Business Policy](#) that contemplates norms of conduct applicable to all Professionals of the Grupo and interest groups in all countries where Frinsa operates.

It requires all its Professionals to not accept nor offer, directly or indirectly: payments, gifts, services or any type of benefits destined to, or coming from, public officials, politicians, political parties or any other physical or judicial person intending to perform or abstain from performing any act facilitated by their activity or role.

At Grupo Frinsa it is prohibited to obtain a benefit or commercial advantage in an undue manner. Totally forbidden are acts of:

- active bribery: situations in which an undue benefit is offered or promised (money, gift, service, etc.) to a public official, or any other person, as a means to make or abstain from making any act facilitated by the role or function of the person in question;
- passive bribery: situations in which an individual requests or accepts offers, promises of money, gifts, services or benefits to make or abstain from making acts facilitated by his/her position or task.

Grupo Frinsa also rejects and prohibits “indirect” bribery; this means made by third parties that act in the name of, or by account of, companies or individuals.

Said acts, besides constituting illicit penal actions, also expose their perpetrators, especially companies, to important negative impacts of a commercial character (loss of contracts) and reputation (corporate image).

Grupo Frinsa requires all its Professionals to read and familiarize themselves with the [Anti-corruption and Ethical Business Policy](#) of Grupo Frinsa, which is of obligatory compliance for all the Frinsa Professionals, and the infractions of which can lead to disciplinary measures, including being fired. Any doubt or question that may arise in a Professional in relation to the mentioned policy must be addressed to the Ethical and CSR Committee.

## **9. Security in the relationship with suppliers**

### **Obtaining the commitment of the suppliers to the Code of Conduct for Suppliers of Grupo Frinsa.**

Grupo Frinsa requires all the suppliers with whom it has commercial activities to respect ethical standards in all their activities.

Grupo Frinsa bases the relationships with its suppliers on transparency, trust and mutual benefit. Frinsa wants to promote responsible and sustainable practices among its suppliers. For this reason, all the suppliers and, as an indispensable prerequisite for homologation, are obligated to know and adhere to the [Code of Conduct for Suppliers](#).

The suppliers must establish and maintain appropriate management systems in relation to the [Code of Conduct for Suppliers](#) in their entire supply chain, as well as supervise and actively modify the management procedures and operations to verify that they are adjusted to the principles of the code.

In terms of **human rights** and **labor conditions**, Grupo Frinsa is concerned that its suppliers respect the fundamental principles established in the International Labor Organization Convention and, in particular, those relative to child labor, forced labor, working time, salaries, freedom of expression and equal opportunities.

In terms of **hygiene, safety** and the **environment**, Grupo Frinsa requires that all suppliers guarantee optimal hygiene and safety conditions for their workers. They must also manage all their installations so that the impact of their activities on the environment is reduced to a minimum.

With regards to **conflicts of interest**, Grupo Frinsa expects its suppliers to report any conflict of interest that may affect the fulfilling of the tasks or services that have been commissioned by the Grupo.

Regarding **Anti-corruption**, Grupo Frinsa requires of the suppliers to the Grupo to respect the national and international laws and regulations against corruption.

Grupo Frinsa will conform its procedures of supplier selection to criteria of objectivity and impartiality, and will avoid any conflict of interest or favoritism in its selection. The Frinsa Professionals are obligated to comply with the internal procedures established for the selection process, including, especially, those referring to the controls of compliance with the law.

The Professionals that access suppliers' data of a personal nature must maintain the confidentiality and comply with the established applicable legislation regarding data protection of a personal nature. The information given by the Professionals to the suppliers will be true and honest.

The Professionals will avoid any type of interference or influence of the suppliers or third parties that may alter their impartiality and professional objectivity, and they will not receive any type of remuneration coming from suppliers nor, in general, from third parties, for services related to the professional activity within Grupo Frinsa.

## **VI. ETHICAL COMPLAINT CHANNEL**

### **Duties and rights of the workers**

If an employee believes, in good faith, that a law, regulation or any of the principles established in the Ethical Code or the Code of Conduct for Suppliers of Frinsa has been infringed, or is about to be infringed, the employee may freely inform a superior or the Ethical and CSR Committee.

### **Specific alert system for concrete areas ("Alert")**

Further, if an employee, in good faith, has any doubt or suspicion about possible illegal practices in the following areas:

- financial, accounting, banking and fight against corruption;
- anti-competition practices;
- fight against discrimination and abuse in the workplace;
- health, hygiene and safety in the workplace;
- protection of the environment;
- food safety,

the employee can and must inform his/her supervisor (directly or indirectly), or use the safe complaint system described below.

### **Complaint mechanisms in other areas (the "Complaint")**

With full respect for the applicable norms regarding the matter of data protection, Frinsa will extend the use of this Alert System to denounce any other irregularity, violation of the principles that rule Human Rights and, in particular, any accusation relative to conducts or situations contrary to this Code or the Code of Conduct for Suppliers.

This complaint channel will be open to Frinsa employees and all external and occasional workers of Grupo Frinsa, as well as suppliers and clients.

### **Collecting of alerts and complaints**

The alerts and complaints are communicated to the direct or indirect supervisor, as the case may be, and/or the Ethical and CSR Committee. The author of the alert/complaint must inform them, orally or in writing, of the facts, data and documents, independently of their form or type, on which the alert is fundamented and, if it is the case, allow an exchange of opinions with the destinatary of it.

The complaints must contain the following information to be accepted:

- Identification data of the complainant
- Argument or precise and verified proof
- Person or collective denounced

The following secure system of alert and complaint may be used:

Sending an e-mail to: [canaletico@grupofrinsa.com](mailto:canaletico@grupofrinsa.com)

The complainant will be informed of the reception of the alert or complaint, as well as of the reasonable and predicted needed time to examine its admission without delay and in writing.

### **Processing of the Alerts/Complaints**

The processing of the Alerts/Complaints made through the Ethical Channel corresponds to the **Ethical and CSR Committee**. In the case that a complaint may affect a member of said Committee, this person will abstain from participating in its processing.

Grupo Frinsa will treat the data gathered during the Alert/Complaint confidentially (in a coherent manner with the adequate procedures of evaluation and investigation).

Grupo Frinsa requires that the author of the complaint identifies himself/herself (this means, identity, functions and contact details) when making the Alert/Complaint. His/her identity will be treated in a strictly confidential manner, and will not be revealed to the person subject of the Alert/Complaint.

The elements that may serve to identify the author of the Alert/Complaint can only be revealed to the judicial authority, with the consent of the author. Frinsa also guarantees the confidentiality of the persons affected by the Alert/Complaint. The elements that may identify the person implicated in an Alert/Complaint can only be revealed to the judicial authority once the justification for the Alert/Complaint has been established.

The **Ethical and CSR Committee** (and/or any other department indicated by the Management) will be informed immediately of any Alert/Complaint by a person with Responsibility within Grupo Frinsa.

The **Ethical and CSR Committee** will open a numbered file and will immediately confirm reception of the Alert/Complaint by e-mail to the complainant, and will inform this person of the estimated time needed to process the Alert/Complaint. The committee will perform an investigation of the communicated allegations and, if necessary, of the implications to other departments. It will keep the employee or external collaborator identified as the sender duly informed of the course given to the Alert/Complaint,

which will maintain, until its closure, the number initially given to it for its better traceability and follow-up.

Any Alert/Complaint that reveals a fraudulent behavior, or a significant non-compliance with the laws or internal politics of Grupo Frinsa, will have as a result corrective actions, disciplinary sanctions or judicial proceedings, whatever the case may be.

#### **Guarantees offered to the workers, external collaborators and persons affected by a Complaint**

- No sanction will be imposed on the workers that do not use the alert/complaint system or that use it in good faith.
- Possible sanctions for the undue use of the alert/complaint system: if it is necessary and depending on the circumstances, Frinsa reserves the right to impose disciplinary sanctions on the persons that make undue use in bad faith of the alert/complaint system. In such a case, there could also be legal actions.
- The right to inform the subject in the case of being the object of the alert/complaint: in the framework of the procedure described previously, the Ethical and CSR Committee (or any other department indicated by the Management) will inform the person object of the alert/complaint as soon as the data concerning him/her is registered. When cautionary measures may be required, in particular to avoid the destruction of evidence relative to the alert/complaint, the act of informing the subject could be postponed in order to apply such measures. The notification will be made by any means that guarantee its delivery to the interested person. It will also specify the identity of the person responsible of the alert/complaint system, the infractions being accused of, the departments that would be the destinataries of the complaint, as well as the terms of his/her rights of access and rectification referred to as follows.
- Respect of the right to access and rectify personal data: Frinsa guarantees all the persons identified in the framework of the system of alert/complaint of the right to access all the data that concerns them and to request its rectification or elimination if the data is inexact, incomplete, wrong or expired. The person that is object of an alert/complaint cannot, in any case, obtain, on the basis of this right of access, information relative to the identity of the complainant.
- Duration of the conservation of the personal data: the data that is beyond the reach of the alert/complaint system will be destroyed. That data which may allow the identification of the complainant and the persons to which the complaint is destined will be destroyed when no due process of the alert is made. Said destruction will take place within a period of two months from the closure of all operations of admission or verification. The complainant and the persons affected will be notified in writing of this closure.

When disciplinary or legal actions are started against the accused or the author of an abusive and difamatory complaint, the data relative to this alert or complaint will be conserved until the end of the proceedings.

The data subject to archival measures will be conserved with restricted access during a period that will not exceed the period for contentious processes.

#### **Formalities required by the Spanish Data Protection Agency**

In compliance with the current legislation, the treatment of personal data necessary to implement the

Alert and Complaint Systems will be made with the maximum rigor and confidentiality regarding the personal data of the persons that may be involved.

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**Jorge Carregal Varela**  
**CEO Grupo Frinsa**