



**SUPPLIER CODE OF CONDUCT
OF THE EBRO FOODS GROUP**



1. Introduction

The Code of Conduct of the Ebro Foods Group (“**Code of Conduct**”) sets out the basic values and principles that should underlie all relations between the companies and professionals of the Ebro Foods Group (“**Group**”) and their suppliers and service providers (“**Suppliers**”).

This Supplier Code of Conduct develops the commitments established in the Code of Conduct and establishes the guidelines to be followed by all Suppliers who contract with the Group, especially those operating in countries rated as high risk by the International Labour Organisation.

Suppliers will be responsible for publicising the principles and commitments established in this Code throughout their own organisations and their supply chains, if the latter supply goods and services to the Group companies.

1. Object

In this Supplier Code of Conduct (“**Code**”), Ebro Foods, S.A. (“**Company**”) explicitly establishes the principles, rules and business practices that must be observed by its Suppliers in their relations with the Group and its professionals.

2. Scope

This Code is applicable to all the Suppliers of companies in the Ebro Foods Group, without prejudice to any specific provisions that may be applicable in accordance with the local laws, customs and practice in different jurisdictions.

This Code is also applicable to the Group companies and professionals (i.e. directors, executives and employees), who must foster compliance with the Code by the Suppliers they deal with.

3. Rules and Principles

Apart from the Group’s Code of Conduct, Suppliers’ actions will also be governed by the following rules and principles:

3.1 Commercial integrity

- Suppliers shall operate ethically, upholding honesty, equality and integrity.
- Suppliers shall comply fully with the legal provisions applicable to all the aspects related with their activity and in all the jurisdictions in which they operate. This means taking the necessary measures to see that they are familiar with the laws and informing all members of their respective organisations of their obligation to comply with them and of the establishment and implementation of those measures.
- Suppliers shall eradicate and prevent any form of bribery and/or corruption within their structures and areas of influence.

- Suppliers shall not give gifts to any Ebro Foods employees in the form of money, goods, promotional services or of any other nature having a value exceeding what may reasonably be considered habitual for this type of gestures and/or common practice.
- Suppliers shall guarantee at all times the confidentiality and non-disclosure of any information that they may have on Ebro Foods, even after the end of their contractual relationship.
- If any activity related with goods and services for Ebro Foods is outsourced, the Suppliers shall guarantee the total traceability and transparency of the subcontractors involved, making sure they comply with this Code of Conduct.

3.2 Labour rules

- Suppliers shall respect the Fundamental Rights contemplated in the ILO Conventions and Recommendations at their workplaces.
- Suppliers shall offer their employees decent, fair working conditions in respect of salaries, working hours, rest, holiday, leave and the possibility of achieving an adequate work-life balance.

3.3 Human rights

- Suppliers shall take the necessary measures to guarantee total respect for human rights within their respective organisations, in accordance with the Universal Declaration of Human Rights.
- Suppliers shall also reject any violation of human rights outside their organisations.

3.4 Child labour

- Children below 15 years of age, or below the minimum age of employment permitted by the ILO conventions, shall not be contracted or employed.

3.5 Forced or compulsory labour

- All forms of labour exploitation and forced or compulsory labour are expressly prohibited.
- Suppliers shall take all the necessary measures to comply with the rules and recommendations stipulated by the government and/or local authorities. They shall by no means employ workers who do not have the necessary work permits.
- All threats of violence, sexual harassment and any other threats or abuse, including verbal abuse, are prohibited.

3.6 Freedom of association and collective bargaining

- Suppliers shall recognise their employees' right to form part of collective associations representing workers' interests, in accordance with the applicable laws.
- Suppliers shall respect the rights of these workers' organisations, associations and unions so that their members may be represented and exercise their right to collective bargaining wherever it is allowed by local laws.

3.7 Equality of opportunity and treatment

- Suppliers shall promote equal conditions for access to employment, training and benefits for all workers with equal abilities.
- Suppliers shall ensure that no employees perform work that is incompatible with their physical or mental abilities.
- Suppliers shall ensure the absence of labour discrimination on the basis of race, colour, sex, religion, ancestry, ethnic or social origin or status, age, disability, marital status, sexual orientation, political opinion, affiliation or health.

3.8 Salaries and working hours

- Suppliers shall guarantee that the salaries and other benefits it pays its employees conform to the laws and regulations in the geographical regions in which they operate.
- Suppliers shall offer their employees reasonable working hours conforming to local laws. Working times shall be supervised.
- Overtime shall be voluntary, supervised and paid at a rate equal to or higher than that established in the national laws.
- Suppliers shall guarantee their employees' right to take the paid leave contemplated in the laws and regulations applicable in each country.

3.9 Health and safety

- Suppliers shall comply with local laws on health and safety and the relevant requirements established by the International Labour Organisation.

3.10 Workplace

- Suppliers shall guarantee safe, healthy working conditions for their employees.
- Suppliers shall provide adequate training and supervision for all their employees working in potentially hazardous conditions.
- Suppliers shall provide their employees free of charge with basic safety elements, equipment and protective clothing.

- Suppliers shall take such measures as may be necessary to minimise the risk of fire, accidents or injuries to workers.

3.11 Product safety and quality

- Suppliers shall ensure that all the products supplied to Group companies comply with the applicable food safety and quality laws and standards.
- Suppliers shall inform the Group immediately of any comments they may have regarding product safety.

3.12 Environment

- Suppliers shall comply with the applicable environmental laws and regulations.
- Suppliers shall endeavour to minimise their environmental impact and promote actions for improvement in respect of emissions, water consumption, waste generation and management, energy consumption, use of raw materials and other resources.

4. Compliance with the Code

- The Group and its professionals shall ensure that Suppliers accept and comply with this Code, informing all Suppliers with which it contracts of the existence of the Code.
- The Group reserves the right to demand acceptance and compliance with the Code by its Suppliers, as a prerequisite for entering into a commercial relationship or at any time within that relationship, in such manner as it may deem fit, including a formal, written declaration.
- The Group reserves the right to supervise and check compliance by its Suppliers of the rules and principles laid down in this Code.
- Suppliers undertake to allow such checks and verifications as the Group may deem fit to confirm full compliance with the Code.
- In the event of default by a Supplier of any of the rules or principles established in this Code, the Group reserves the right to demand implementation of the necessary corrective measures and to bring any legal action to which it may be entitled.

Reference documents:

- Universal Declaration of Human Rights
<http://www.un.org/en/documents/udhr/>
- United Nations Convention on the Rights of the Children
<http://www2.ohchr.org/english/law/crc.htm>



- ILO Conventions and Recommendations

<http://www.ilo.org/ilolex/english/convdisp1.htm>

<http://www.ilo.org/ilolex/english/recdisp1.htm>

- United Nation Global Compact

<http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html>

- Ebro Foods Code of Conduct

http://www.ebrofoods.es/fileadmin/user_upload/codigo_de_conducta/EF-CODIGO%20DE%20CONDUCTA%202015%20EN.pdf