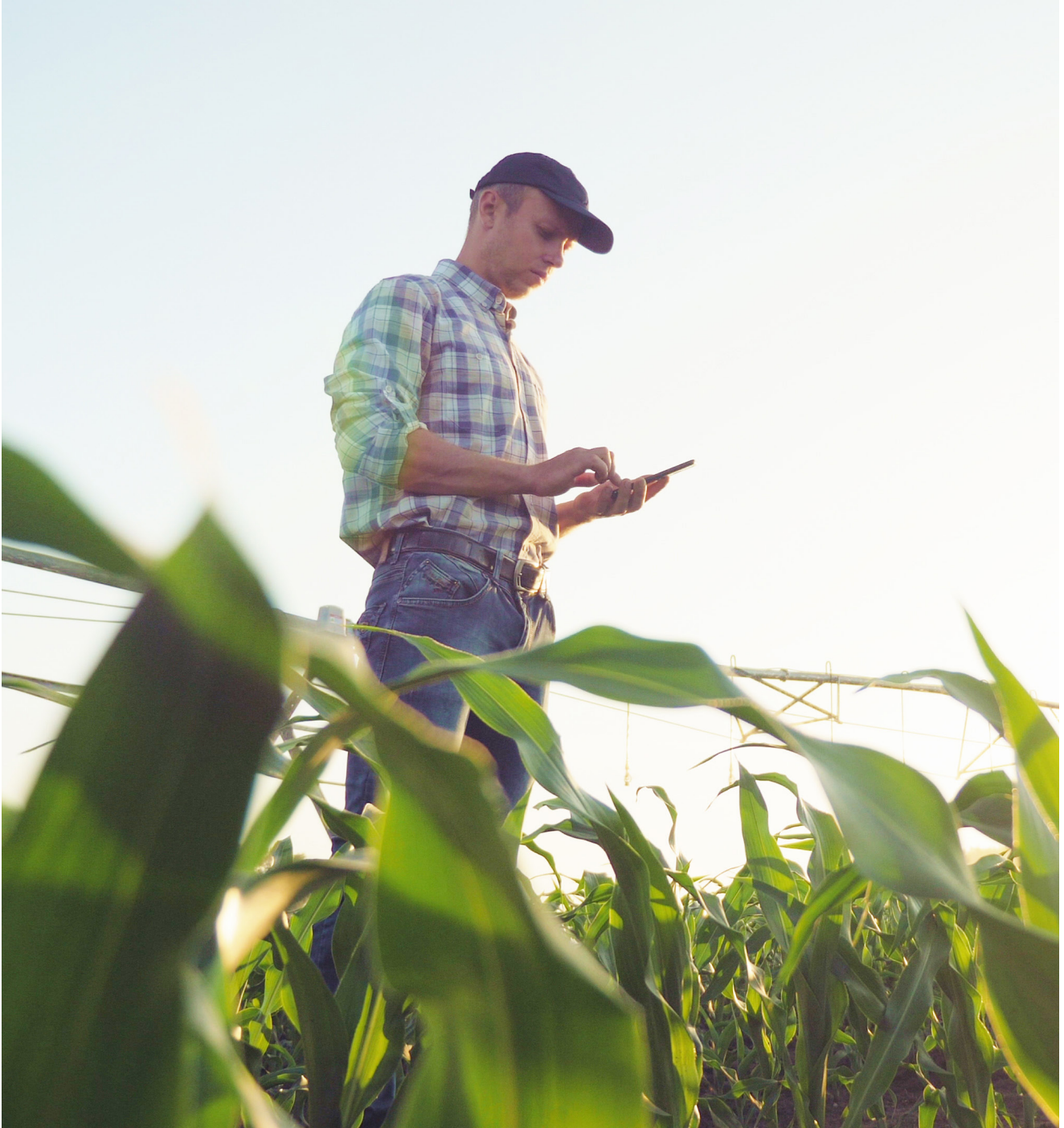


HUMAN RIGHTS



EBRO FOODS, S.A.

HUMAN RIGHTS



Ensuring respect for Human Rights throughout our supply chain is one of the Group's priorities in Social Responsibility. We base our criteria in this respect on the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

This commitment is set out in: (i) our Code of Conduct, which establishes the principles and values that must underlie the actions of all persons and companies in the Ebro Foods Group, and (ii) our Supplier Code of Conduct, which establishes the principles, standards and business practices to be met by our suppliers and service providers in their relations with the Group and its professionals.

The Group's commitment to Human Rights is set out in Section IV, point 9 of our Code of Conduct. Points 9.1, 9.3, 9.4, 9.5 and 9.6 lay down the guidelines for eliminating discrimination in employment and occupation, eliminating forced or compulsory labour, effectively abolishing child labour and exercising the rights of freedom of association, to join unions and collective bargaining, in accordance with the laws currently in place. The same commitments are set out in points 3.2, 3.3, 3.4 and 3.7 of the Supplier Code of Conduct. Both Codes can be consulted on the Ebro Foods corporate website (<https://www.ebrofoods.es/en/csr/csr-in-ebro/codes-and-policy/>).

GRIEVANCE AND FOLLOW-UP MECHANISMS

The main grievance mechanism is the reporting channel of the Code of Conduct (canaldedenuncias@ebrofoods.es), through which any persons bound by the Code may report any breach of the principles set out therein, under a guarantee of absolute confidentiality. Only the Chair of the Audit and Compliance Commission of the Group parent has access to that e-mail account, which is protected with IT security systems to prevent any unauthorised access. The Committee Chair is responsible for prioritising, processing, investigating and solving grievances according to their importance and nature, assisted by the Compliance Unit.

In addition to the confidential reporting channel, the Human Resources Departments of the different companies in the Group can also process, investigate and solve any incidents that may arise within their respective companies.

Four incidents of discrimination were reported in Riviana Foods (USA) during 2019. Two did not require any action by the Company, in one case a situation was detected that required remedial action and the other is currently pending solution.

2019					
COMPANY	MEN	WOMEN	ADDRESSED	SOLVED	TOTAL
Riviana	3	1	4	3	4

2018					
COMPANY	MEN	WOMEN	ADDRESSED	SOLVED	TOTAL
Riviana	3	2	5	1	5

External audits are conducted regularly in companies both within and outside the scope of consolidation of the Group as an additional tool for monitoring and control of human rights.

AUDITS MADE AT EBRO GROUP WORKPLACES

COMPANY	SITE	COUNTRY	DATE	TYPE OF AUDIT	AUDIT COMPANY
Geovita	Bruno (AT)	ITALY	14/02/2020	SMETA	SGS Italy
Herba Ingredients BV	Plants B, C, E, F	BELGIUM	20/12/2019	SMETA	SGS CBE Belgium
S&B Herba Foods	Regent Mill	UNITED KINGDOM	08/08/2019	SMETA	BVCERT 4 Pillar Audits
S&B Herba Foods	Fulbourn Mill	UNITED KINGDOM	16/05/2019	SMETA	BVCERT 4 Pillar Audits
Ebro India	Ebro India	INDIA	10/07/2019	SMETA	DNV GL
Herba Ricemills	La Rinconada	SPAIN	18/06/2019	SMETA	Intertek Spain
Herba Ricemills	San Juan de Aznalfarache	SPAIN	25/04/2019	WCA	Intertek
Bertagni	Vicenza	ITALY	27/02/2019	WCA	Intertek
Garofalo	Gragnano	ITALY	21/01/2019	SA8000	DNV GL
Garofalo	Gragnano	ITALY	30/07/2019	SA8000	DNV GL
Herba Bangkok	Nong Khae	THAILAND	16/11/2018	BSCI	BureauVeritas
Herba Bangkok	Nong Khae	THAILAND	13/09/2019	Fair Trade	Flocert
Lassie	Wormer	NETHERLANDS	06/12/2019	SMETA	SGS
Riviana (Pasta Business)	Winchester	USA	05/03/2019	SMETA	SGS North America, Inc.



TRAINING ON HUMAN RIGHTS POLICIES AND PROCEDURES GIVEN DURING THE YEAR

Specific training on human rights has been given in the following Group companies during the year:

COMPANY	2019				2018			
	NO. EMPLOYEES TRAINED	NO. HOURS	TOTAL EMPLOYEES	% OF TOTAL EMPLOYEES	NO. EMPLOYEES TRAINED	NO. HOURS	TOTAL EMPLOYEES	% OF TOTAL EMPLOYEES
Ebro India	151	2	151	100.00%	123	2	123	100.00%
Garofalo	---	---	---	---	134	1	193	69.43%
Herba Bangkok	124	1	227	54.63%	188	1	188	100.00%
Herba Cambodia	6	3	6	100.00%	6	3	6	100.00%
Lassie	71	1	71	100.00%	---	---	---	---
S&B Herba Foods	4	1	106	3.77%	8	2	104	7.69%
Transimpex	64	1	64	100.00%	---	---	---	---

The Ebro Group did not have any security personnel on its payroll during 2019.

HUMAN RIGHTS DUE DILIGENCE

To support the Group's commitment to Human Rights, the Sustainability Plan HEADING FOR 2030 contemplates a specific working area in Human Rights for the coming years. Accordingly, the main actions that will be taken as from this year 2002 are: (i) a due diligence process to identify the possible impacts of our organisation on Human Rights and draw up a map of significant issues in this area, for both our businesses and the value chain; and (ii) further awareness and training programmes promoted by the parent in addition to those already in place.