



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 Corporate Social Responsibility and Sustainability. 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/>).

Human Rights due diligence

To support our commitment to Human Rights, the Ebro Foods Group is exploring the implementation of a Due Diligence System to detect, prevent and mitigate existing and potential adverse effects of our operations and throughout our value chain. Working towards this, we have prepared a detailed Due Diligence Questionnaire, which will be taken as the basis for defining, identifying, assessing and measuring risks, thus generating opportunities for subsequent verification and control, adopting the necessary, proportionate measures to mitigate, reduce or remedy those risks, as the case may be.

The Questionnaire is at the discussion stage within the global Sustainability working party set up within the Group in 2020, with a view to having the final document and implementing it in the second quarter of 2021.

Based on the conclusions drawn from the questionnaire, the parent company will promote ad hoc training in Human Rights within the different subsidiaries and stimulate awareness of the convenience of having a good Due Diligence System throughout the entire value chain.

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.

No human rights grievances were reported in the Ebro Group in 2020. Four incidents were reported in the subsidiary Riviana Foods (USA) during the previous year.

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	COUNTRY	WORKPLACE	DATE	TYPE OF AUDIT	AUDITORS
Bertagni 1882	Italy	Avio	27/04/2020	WCA	Intertek Italy
		Arcugnano (Vicenza)	27/11/2020	SMETA	Intertek Italy
Boost Nutrition	Belgium	Plant A	23/09/2020	SMETA	SGS CBE Belgium
Geovita Functional Ingredients	Italy	Bruno (AT)	14/02/2020	SMETA	SGS Italy
Herba Bangkok	Thailand	Nong Khae	29/10/2020	BSCI	SGS
Herba Ricemills	Spain	San Juan	17/12/2020	SMETA	Intertek Spain
			08/06/2020	WCA	Intertek Spain
		Algemesí	09/12/2020	SMETA	Intertek Spain
		Coria	09/11/2020	SMETA	Intertek Spain
Lassie	Netherlands	Wormer	30/09/2020	SMETA	SGS
Mundiriso	Italy	Vercelli	26/11/2020	SMETA	SGS
Pastificio Lucio Garofalo	Italy	Gragnano	15/05/2020	SA8000	DNV
				SA8000	DNV

The audits made outside the Group perimeter are indicated in Chapter 11 of this Report “Supplier Management”.

Training on human rights policies and procedures given during the year

Specific training on human rights was given in the following companies during the year:

COMPANY	2020				2019			
	NO. EMPLOYEES TRAINED	NO. HOURS	TOTAL EMPLOYEES	% OF TOTAL EMPLOYEES	NO. EMPLOYEES TRAINED	NO. HOURS	TOTAL EMPLOYEES	% OF TOTAL EMPLOYEES
Boost Nutrition	10	10	103	9,71%	---	---	---	---
Ebro India	21	84	162	12,96%	151	302	151	100.00%
Herba Bangkok	75	225	220	34,09%	124	124	227	54.63%
Herba Cambodia	1	3	6	16,67%	6	3	6	100.00%
Herba Ingredients	27	27	96	28,13%	---	---	---	---
Lassie	---	---	---	---	71	71	71	100.00%
S&B Herba Foods	7	175	109	6,42%	4	4	106	3,77%
Transimpex	66	66	69	95,65%	64	64	64	100.00%

