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HUMAN RIGHTS



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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/>).

Due Diligence in Human Rights

With the aim of underpinning our commitment to human rights, in 2020 the Ebro Foods Group began 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.

A draft Due Diligence Questionnaire was prepared, which would 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 aim was to debate the contents of the questionnaire within the Group Global Sustainability Working Party with a view to having a final document to be implemented in the second quarter of 2021. This process has finally been delayed, pending publication of the Proposal for a *Corporate Sustainability Due Diligence Directive* of the European Union, scheduled for 2021 but finally published on 23 February 2022. We will, therefore, readdress the process this year, in the light of the contents of that Proposal and the future *Environmental and Human Rights Due Diligence Act* in Spain, with the maximum guarantees of compliance.

In this context, regardless of the specific human rights training provided in some of our subsidiaries, the parent company has scheduled an ad hoc training plan for the different subsidiaries, due to commence in 2022 and end in 2024.

Training on human rights policies and procedures given during the year

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

COMPANY	2021				2020			
	NO. EMPLOYEES WHO RECEIVED TRAINING	NO. HOURS	TOTAL EMPLOYEES	% OF TOTAL EMPLOYEES	NO. EMPLOYEES WHO RECEIVED TRAINING	NO. HOURS	TOTAL EMPLOYEES	% OF TOTAL EMPLOYEES
Ebro India	85	170	175	48.57%	21	84	162	12.96%
Herba Bangkok	198	594	198	100.00%	75	3	220	34.09%
Herba Cambodia	10	30	12	83.33%	1	3	6	16.67%
La Loma Alimentos	8	8	145	5.52%	---	---	---	---
Transimpex	75	150	75	100.00%	66	1	69	95.65%

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.

In this context, no human rights grievances were reported in any of the Group companies in 2021.

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

16 audits were made at Group workplaces during 2021.

COMPANY	COUNTRY	WORKPLACE	DATE	TYPE OF AUDIT	AUDITORS
Bertagni 1882	Italy	Arcugnano	01-10-2021	SMETA	Intertek Italy
			05-02-2021	ERSA	
		Avio	01-10-2021	SMETA	
			11-02-2021	ERSA	
Ebro India	India	Taraori	12-03-2021	SMETA	SGS ASIA
			13-09-2021		
La Loma Alimentos	Argentina	Los Charrúas	29-07-2021	SMETA	Intertek Argentina Uruguay and Paraguay
		Chajari	31-07-2021		
Neofarms Bio	Argentina	Oficina Concordia	30-07-2021	SMETA	Intertek Argentina Uruguay and Paraguay
Pastificio Lucio Garofalo	Italy	Gagnano	13-01-2021	SA8000	DNV
Riviana Foods USA	USA	Freeport TX	16-11-2021	SMETA	Intertek-United-States
S&B Herba Foods	UK	Fulbourn Mill (Cambridge)	11-03-2021	SMETA	Bureau Veritas Certification
			02-06-2021		
Herba Bangkok	Thailand	Nong Khae	15-03-2021	BSCI	SGS
Roland Monterrat	France	Feillens	01-10-2021	MSC	SGS
			01-10-2021	ASC	



Audits made on suppliers

27 SMETA audits were made on suppliers during 2021.

COUNTRY	DATE OF AUDIT	AUDITORS
Austria	10-02-2021	Bureau Veritas Certification
Brazil	24-02-2021	SGS Brazil
Germany	21-09-2021	Bureau Veritas Certification
Greece	03-03-2021	Intertek Bulgaria
	04-03-2021	
Italy	28-06-2021	Bureau Veritas Certification
	08-06-2021	SGS Italy
	26-11-2021	ABS Quality Evaluations Inc
	31-05-2021	Bureau Veritas - EMEA
Mexico	26-03-2021	Intertek Mexico
Norway	20-06-2021	DNV
Pakistan	06-10-2021	ALGI Pakistan
	16-09-2021	Elevate
	11-06-2021	Bureau Veritas Certification
Peru	12-09-2021	SIPAS CR-PERU
	13-07-2021	Intertek Peru
Spain	29-09-2021	SGS Spain
	25-02-2021	
	19-01-2021	Intertek Spain
	11-01-2021	
	20-05-2021	
	18-05-2021	
Switzerland	12-08-2021	Bureau Veritas Certification
Thailand	24-09-2021	SGS Thailand
UK	01-09-2021	SGS_UK
	01-11-2021	
USA	01-03-2021	Intertek Peru