

04.



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

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's Global Sustainability Working Party with a view to having a final document to be implemented. This process was finally delayed, pending publication of the final text of the *EU Corporate Sustainability Due Diligence Directive* and its transposition into Spanish law.

In this context, in the light of the Proposal for the EU Corporate Sustainability Due Diligence Directive, published on 23 February 2022, and with a view to facilitating the identification of risks within and outside the consolidated group, in 2022 the parent of our Group promoted the launching of a compulsory training course in Human Rights for all the company's professionals. This course will end in 2024 and has the following course plan:

1. Spain, completed
2. Rest of Europe, Africa and Asia
3. North and South America

This Training Plan, the contents of which have been tailored to the different professional categories, is being followed online through the SAP Litmos e-learning platform by professionals with a corporate e-mail account, and onsite by factory staff.

In addition, specific Human Rights training has been given over 2022 in the following companies:

COMPANY	2022			2021		
	No. EMPLOYEES WHO RECEIVED TRAINING	No. HOURS	% TOTAL EMPLOYEES	No. EMPLOYEES WHO RECEIVED TRAINING	No. HOURS	% TOTAL EMPLOYEES
Ebro India	23	204	12.85%	85	170	48.57%
Herba Bangkok	102	306	52.58%	198	594	100.00%
Herba Cambodia	6	18	40.00%	10	30	83.33%
La Loma Alimentos	159	81	100.00%	8	8	5.52%
S&B Herba Foods	17	4	15.18%	---	---	---
Transimpex	85	170	100.00%	75	150	100.00%

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.

Within the framework of the Proposal for a Due Diligence Directive, during 2023 the Group will enable an external complaints channel, in addition to the channel already existing, which will be at the disposal of all our stakeholders and conveniently publicised through all the corporate reporting channels.

Ebro is also in the process of integrating the different complaints channels currently enabled within the Internal Information System under Act 2/2023 of 20 February regulating the protection of individuals who report infringements of laws and regulations and the fight against corruption, transposing the EU Directive 2019/1937 of 23 October 2019 (known as the "Whistleblowing Directive"), which entered into force on 13 March 2023.

Apart from the Confidential Complaints Channel, the Human Resources Departments of the different companies in the Group also have channels enabled to process, investigate and solve any incidents that may arise within their respective companies.

In this context, eleven grievances were reported in 2022 in the Human Resources Departments of the following Group companies. Six of them had been solved by the closing date of this Report:

COMPANY	LODGED	PROCESSED	SOLVED
La Loma Alimentos	1	1	1
Riviana Foods	6	6	1
S&B Herba Foods	2	2	2
Tilda	2	2	2
TOTAL GRIEVANCES	11	11	6

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.

13 ethics audits were made at Group workplaces during 2022.

COMPANY	COUNTRY	WORKPLACE	DATE	TYPE OF AUDIT	AUDITORS
Ebro India	India	Taraori	06/10/2022	SMETA	DNV
Herba Cambodia	Cambodia	Phonm Phen	25/04/2022	SMETA	ELEVATE
Herba Ricemills	Spain	San Juan	21/03/2022	SMETA	Intertek Spain
Pastificio Lucio Garofalo	Italy	Gagnano	05/07/2022	SA8000	DNV
Riviana Foods	United States	Brinkley	01/02/2022	SMETA	Accordia Global Compliance Group
		Memphis	05/05/2022	BSCI	
		Carlisle	02/02/2022	SMETA	
		Clearbrook	18/01/2022	SMETA	
		Alvin	08/03/2022	SMETA	
		Colusa	13/01/2022	SMETA	Control Union
S&B Herba Foods	United Kingdom	Regent mill	12/01/2022	SMETA	Bureau Veritas Certification
			18/05/2022	SMETA	
Herba Bangkok	Thailand	Nong Khae	26/10/2022	SMETA	SGS

□ Audits made on suppliers

54 SMETA audits were made on suppliers during 2022, 6 of them follow-up audits.

COUNTRY	DATE OF AUDIT	AUDITORS
Argentina	13-07-2022	Bureau Veritas Certification
	14-07-2022	
	16-07-2022	
Belgium	19-09-2022	Intertek France
	25-01-2022	SGS CBE Belgium
Cambodia	19-08-2022	SGS (Cambodia) Limited
France	05-04-2022	SGS France
	17-05-2022	
	19-10-2022	
	03-02-2022	Bureau Veritas Certification
	21-07-2022	
	27-07-2022	
	15-06-2022	
01-12-2022	BUREAU VERITAS CPS - EMEA	
05-09-2022	DNV	
Germany	21-04-2022	Intertek Germany
	19-04-2022	
	05-05-2022	Bureau Veritas Certification
	12-08-2022	TUV NORD CERT GmbH
	14-07-2022	
Greece	07-07-2022	Intertek Bulgaria
	31-05-2022	SGS_UK
Hungary	01-07-2022	Bureau Veritas Certification
India	26-05-2022	Bureau Veritas Certification
	20-07-2022	SGS ASIA
	07-11-2022	
	18-03-2022	Intertek India
Italy	22-06-2022	Intertek Italy
	14-04-2022	
	06-06-2022	SGS Italy
	25-05-2022	
	23-11-2022	
Mexico	08-06-2022	DNV
Netherlands	25-08-2022	Bureau Veritas Certification

COUNTRY	DATE OF AUDIT	AUDITORS
Pakistan	04-10-2022	ALGI Pakistan
	29-09-2022	ELEVATE
	16-07-2022	ALGI Pakistan
Peru	10-08-2022	SIPAS CR-PERU
Poland	03-11-2022	SGS Poland
Portugal	14-10-2022	Intertek Portugal
Thailand	02-09-2022	SGS Thailand
	02-11-2022	
	17-03-2022	
	19-09-2022	
	25-05-2022	
Turkey	14-02-2022	Intertek Turkey
	24-05-2022	
United Kingdom	22-02-2022	SGS_UK
	28-09-2022	Verisio
	01-08-2022	Intertek UK
	08-08-2022	Verner Wheelock (incorporating KSSA)
	21-11-2022	
United States	18-01-2022	Accordia Global Compliance Group (Home Office)
	23-02-2022	Intertek Peru

