

**CODE OF ETHICS
AND
CONDUCT**



April 2024

MESSAGE FROM THE BOARD OF DIRECTORS

Our company has grown a lot since it was founded in the 50s. During this sustainable growth, all the people who have formed and continue to form this project have had great responsibility without which our present and, above all, our future could not be understood. This good work by everyone has translated into prestige and reputation, we believe deservedly so, established in essential elements to continue to compete on the market.

The purpose of this Code of Ethics and Conduct is to provide us with a summary of the minimum standards of behavior; rules that, on the other hand, were already applicable in our organization by custom and our business ethics. These regulations should help us continue to maintain our prestige and reputation.

The behaviors included in this Code are minimum standards. Some principles and guidelines of behavior that our entire team must comply with and which should serve as a guide to any behavior or decision that is taken in our companies anywhere in the world.

We believe that compliance with this Code will push us to continue growing in a sustainable way, to maintain the social peace that has existed since we began, and to avoid liabilities and damages of any kind.

In short, we hope that this Code can help us to continue believing that our organization is reflected in each one of us, that we are all important, and that our prosperous future is built on respect and compliance with the rules.

The Board of Directors

PREAMBLE

This “Code of Ethics and Conduct” (hereinafter, the Code), which is inspired by the Institutional, Business-related, and Organizational Principles of JEALSA (formed, for the purposes of this Code, by all national or foreign companies directly or indirectly invested in or controlled by CORPORACIÓN EMPRESARIAL JEALSA, SL), is intended to reflect the corporate values and basic principles of conduct that must guide the actions of JEALSA and the people that form it, without exception. This Code is, therefore, the fundamental standard of JEALSA. No act or behavior against it will be tolerated.

We must be aware that in the development of our professional work some of our activities may affect the image and reputation of JEALSA. Therefore, it is very important not only what we do but also how we do it.

The JEALSA Code reflects the principle of due diligence applied to the prevention, detection, and eradication of irregularities related to breaches of the Code and the established internal norms, including those that refer to criminal offenses.

JEALSA understands that diligence in these matters requires that we design and implement control models that regularly analyze the risks in the areas contemplated in this Code, ensure knowledge of the rules in the organization, define responsibilities, and establish procedures that allow for confidential notification of irregularities as well as solving them. JEALSA understands that the procedures it has in place, including the criminal and legal risk prevention model, allow it to respond to the previous requirements.

The wording of the Code has been approved by the board of directors of CORPORACIÓN EMPRESARIAL JEALSA, S.L. (hereinafter, the Board of Directors), as well as all its subsidiaries.

1.- SCOPE OF APPLICATION

It is mandatory for this Code to be applied by the administrative bodies of JEALSA companies (in the terms defined in the preamble), by its directors and proxies, and by its employees, as well as by the interest groups that are related to JEALSA.

People acting as representatives of JEALSA in companies and entities outside of the business group will observe the provisions of this Code and will, within their competences and responsibilities, promote the application of its

principles and guidelines of conduct in those other entities. Likewise, in the same way, the representatives of JEALSA will, in Joint Ventures, Temporary Unions of Companies, Economic Interest Groups, and other similar associations in which they participate, strive to ensure that they comply with these conduct guidelines.

As far as possible, the application of the Code shall extend to any individual and/or legal entity connected to JEALSA.

The Code will be personally communicated to all directors, executives, employees, and any person representing JEALSA, who must assume in writing their commitment to comply.

The conduct guidelines contained in this Code are not intended to consider all situations or circumstances that JEALSA employees may encounter, but to establish general criteria of conduct that guides them in their behavior during the performance of their activities in connection with JEALSA.

The internationalization process has given JEALSA a multinational dimension, with a diversity of people and scenarios. In this sense, the administrators, managers, and employees of international subsidiaries to which other regulations apply, will additionally comply with the national legislation of the countries in which they carry out their activity.

2.- BASIC PRINCIPLES OF CONDUCT.

JEALSA believes that the confidence in the market and all the entities or persons with whom they have or may have a relationship is based on integrity, responsibility, and regulatory compliance in the professional performance of each of its employees and managers.

Integrity is understood to be ethical, honest action in good faith in all situations, that is to say, both in internal relationships and with third parties (suppliers, customers, public administrations, etc.).

Professional responsibility implies acting efficiently, always seeking quality, and not generating contractual or extra-contractual responsibilities for JEALSA.

Regulatory compliance will imply the obligation of all employees to comply with any applicable standards, of any kind and order, and especially those of this Code and all internal standards approved by JEALSA in any matter and scope.

These basic principles shall be required, insofar as possible, to external suppliers and collaborators, to the extent that their behavior may affect the reputation and responsibility of JEALSA.

3.- CONDUCT GUIDELINES TO BE OBSERVED.

This Code, in a non-exhaustive manner, aims to establish a series of behavior guidelines that it considers to be essential for compliance with the basic principles of conduct established. Any acts or behavior contrary to what is established in this Code will not be tolerated.

The guidelines to be complied with shall be carried out in the following fields:

- **Commitment of the Board of Directors.**
- **Integrity and ethics.**
- **Regulatory compliance.**
- **Transparency in information.**
- **Respect for the Market and the competition.**
- **Protection of JEALSA's reputation.**
- **Respect for the environment and people's health.**
- **Respect for human rights.**
- **Relations between employees.**
- **Relations with suppliers and clients.**
- **Relations with public administrations.**
- **Avoiding conflicts of interest.**
- **Correct use of assets.**
- **Confidentiality and data protection.**

a) Commitment of the Board of Directors.

The board of directors of CORPORACIÓN EMPRESARIAL JEALSA, SL, on its behalf and on behalf of its subsidiaries, assumes the maximum commitment in striving to ensure that the behavior of any person or entity linked to its organization meets the standards contained in this Code of Ethics and Conduct. To this end, it will allocate such time as may be required and will adopt the decisions that are most appropriate for this purpose.

Likewise, it undertakes to promote legal risk control policies within the entire group of companies so that the degree of compliance with any applicable regulation is as high as possible. In order to monitor and control this area, the Compliance Committee has been created, which.

reports directly to the Board of Directors, which is given sufficient autonomy, means, and powers to perform its functions. This Committee is also established as an Ethics Committee insofar as the Council does not decide in the future that it needs to establish separate committees.

b) Integrity and ethics.

Integrity and ethics, in all areas, are fundamental and inalienable requirements that should inspire any conduct by administrators, managers, and employees of JEALSA.

c) Regulatory compliance.

As a basic principle of conduct, regulatory compliance implies the obligation of all employees to comply with all applicable standards.

JEALSA has established effective risk management procedures that allow us to identify, manage, control, and communicate the real and potential risks arising from its activities in accordance with the map and risk level that the Compliance Committee will periodically draft. In addition, specific computer tools will be used in order to control JEALSA's internal processes with the highest security in relation to risks in all legal areas and allow them to be constantly monitored.

If at any time there is an action by a manager or command that is contrary to the law or to this Code, employees acting under such indications or orders will not avoid liability. Any personal order or instruction that contradicts the provisions of a legal or internal norm of JEALSA must be communicated to the Ethics Committee through the established channels.

JEALSA employees should know the regulations that affect their work, requesting the necessary information where applicable through their superior or by going directly to the Compliance Committee.

In order to facilitate due internal control, the decisions of JEALSA employees will be traceable from the viewpoint of regulatory compliance, such that the suitability of the decisions to internal and external standards is justifiable and verifiable, if in order to a review by competent third parties or the Compliance Committee itself.

No employee will consciously collaborate with third parties in the violation of any regulations, nor participate in any action that compromises the principles and guidelines of action of this Code.

d) Transparency in information.

JEALSA wants to give a faithful and complete image of its actions to

the market, partners, employees, and society in general.

Information that, in compliance with national and international regulations, must be provided by the companies that make up JEALSA, will be truthful and comply with all legal requirements and international best practices in corporate governance.

e) Respect for the market and the competition.

All JEALSA employees are committed to free competition and compliance with the laws established in this regard, avoiding incurring any action that entails an abuse or unlawful restriction of competition.

All staff and management team will compete faithfully in the market, and will not allow any deceptive, fraudulent, or malicious practices or behaviors that lead to obtaining any inappropriate advantages on the market.

In undertaking commercial activities, the promotion of JEALSA must be carried out on the basis of objective standards, without distorting the characteristics or conditions of the products offered.

The search for information about the market or competing companies will be carried out ethically and in accordance with the rules that protect this type of information. Information on competitors obtained in a manner that violates business secrecy must be rejected. In particular, special attention will be given to the incorporation of staff from other companies in concurrent sectors.

Company employees will also avoid spreading any malicious, false, or biased information about JEALSA's competitors.

f) Protection of JEALSA's reputation.

JEALSA has a solid reputation thanks to its extensive experience and a solvent and loyal team, committed to the values and know-how that have formed the company's culture since it began.

JEALSA considers its corporate image and reputation to be one of its most valuable assets to preserve the trust of its customers, the people in the organization, and society in general.

All staff and management team will participate in the task of strengthening the name of JEALSA, and above all they are responsible for safeguarding its reputation. In this sense, it is prohibited to use or refer to entities of JEALSA or brands or distinctive signs of JEALSA, as well as any person linked to the Group, in public or in social networks of any kind, either present and future, provided that it implies contempt or disrespect, is detrimental to the reputation of JEALSA, or

to the people who make it up.

It is expressly prohibited to record videos or audios within JEALSA's facilities through any means, except those made by the company itself for its own business purposes or those expressly authorized by management.

Likewise, the correct and adequate use of the corporate image and reputation by the staff of contracting and collaborating companies must be monitored.

g) Respect for the environment and people's health.

Respect and preservation of the environment is one of JEALSA's basic principles of action. Consequently, there is a defined policy on the subject and an environmental management system.

Employees must know about and assume said policy and act at all times in accordance with the criteria of respect and sustainability that it inspires, adopt habits and behaviors related to good environmental practices, and contribute positively and effectively to the achievement of the established objectives.

Employees must strive to minimize the environmental impact derived from their activities and the use of the facilities, equipment, and means of work made available to them, ensuring their efficient use, assuming the commitment to use energy efficiently in their facilities and activities, with the purpose of preserving natural resources, reducing atmospheric emissions, and helping to mitigate the effects of climate change.

In their relations with contractors or external collaborating companies, as far as possible, JEALSA's staff will try to transmit these principles and assert compliance with the environmental regulations that are applicable in each case.

On the other hand, taking into account that the main sector of JEALSA is that of human and animal food using canned products, the health of people and living beings is one of the maxims of action that must guide all staff. Therefore, the staff will strictly comply with all regulations on industrial safety and food quality, at local, national, European, and international levels, whenever required. Even if there are no applicable regulations, attempts will be made to anticipate them in the sense of applying the highest standards of food safety and quality.

h) Respect for human rights.

JEALSA and its employees assume full respect for human rights, pledging to respect the essential rights of people in all areas, in

accordance with the Spanish Constitution, international treaties in this regard, and the regulations of the countries where it operates.

i) Relations between employees.

Human resources policies and relations between employees should always come from scrupulous respect for the dignity of people, and are based on the principles of mutual trust and respect.

JEALSA expressly prohibits the abuse of authority and any type of harassment, whether physical or psychological, as well as any other conduct that may generate an intimidating, offensive, or hostile working environment for people. All JEALSA employees must be treated in a respectful, professional, and friendly manner, to foster a pleasant, rewarding, and safe working environment that encourages people to give the best of themselves. Likewise, relations with employees of collaborating companies will be based on the aforementioned criteria, professional respect, and mutual collaboration.

JEALSA promotes, facilitates, and encourages teamwork in all its employees and between the different units and areas.

All employees are responsible for rigorously complying with occupational health and safety standards, and for ensuring their own safety and that of those affected by their activities. Likewise, JEALSA is committed to continually improving measures to prevent occupational hazards and promote health in the workplace in each of the sectors and places where it operates.

j) Relations with suppliers and clients.

All employees are obligated to act, in their relationships with suppliers and customers, in accordance with the criteria of consideration, respect, and dignity.

JEALSA takes on the commitment to promote among its suppliers and external collaborators, practices in accordance with the guidelines of conduct included in this Code.

JEALSA may require its suppliers and partner companies to commit to take on and expressly comply with the provisions of this Code.

JEALSA protects its customers by establishing and implementing mandatory standards for all suppliers in terms of product health and safety, guaranteeing that all the items it sells do not entail any risks for their health and/or safety in their use. JEALSA employees will ensure that the aforementioned standards are met, as well as the rest of the established rules and procedures, regarding the labeling, quality, and characteristics of their products.

The selection of suppliers will be governed by criteria of objectivity and transparency, reconciling the company's interest in obtaining the best conditions, with the convenience of maintaining stable relationships with ethical and responsible suppliers.

JEALSA's purchases and supplies will be developed with strict compliance to the principles of honesty and regulatory compliance. All decisions taken in these functional areas must be accredited, in the sense that they must be justifiable and verifiable if reviewed by third parties or the JEALSA control bodies themselves. Likewise, JEALSA's staff has the obligation to protect commercially sensitive information regarding the conditions established in relation to their supply chain.

JEALSA's employees may not offer, grant, request, or accept, directly or indirectly, any gifts, favors, or compensation, in cash or in kind, whatever their nature, which may influence the decision-making process related to performance of the duties derived from their position.

k) Relations with public administrations.

JEALSA, in its commitment to the Company, will collaborate in whatever is required by public administrations within its authority and in compliance with regulations.

JEALSA's employees and executives who must interact with public authorities and administrations will do so in a lawful and ethical manner, respecting national and international regulations for the prevention of corruption and bribery. Employees who have relations with representatives of public administrations must be specifically authorized by the company.

Employees who have relations with public administrations must document the decisions taken and prove compliance with applicable internal and external standards, with the aim of allowing both the Compliance Committee and third parties to verify correct regulatory compliance in this regard.

As a general rule, no JEALSA employee may offer, grant, request, or accept, directly or indirectly, any gifts, favors, or compensation, whatever their nature, from any authority or official.

l) Avoiding conflicts of interest.

Conflicts of interest appear in circumstances in which the personal interests of people who work or provide services for JEALSA, directly or indirectly, are contrary or collide with the interests of any JEALSA entity, interfering with the strict compliance with their professional duties and responsibilities or involve them in particular in any.

transaction or economic operation of any group entity.

The relations of all JEALSA staff must be based on loyalty. Thus, any employee must inform the Ethics Committee in the event that they directly or indirectly have to participate in the governing bodies of other companies that may collide with the interests of any JEALSA entity.

Likewise, all staff must refrain from representing JEALSA or influencing decision making in any situation in which they directly or indirectly have a personal interest. In situations where there may be any doubt, the Ethics Committee will have to be informed through the channels established for this purpose, avoiding any risk of doubting the impartiality and honesty of the actions.

m) Correct use of assets.

JEALSA makes the necessary resources available to its staff to develop their professional activity and undertakes to provide the means to protect and safeguard them.

The entire staff must use the company's resources in a responsible, efficient, and appropriate manner in the context of their professional activity. Likewise, they must protect and preserve them from any inappropriate use from which damages may be caused to JEALSA's interests.

The computer and communication equipment and systems that JEALSA makes available to its managers and employees must be used exclusively to carry out their working activity. JEALSA's policy for the use of telematic means and information systems will determine in every moment in detail the improper uses thereof. The company's computer (software and hardware) and telephone systems, as well as email, cannot be used under any circumstances for personal use, or to harm or damage third-party computer systems. JEALSA reserves the right and power to verify the correct use of this rule, being empowered to monitor any of its own computers or telephone terminals used by its staff.

In this way, employees should know that the documents, files, and data contained in JEALSA's computer systems and equipment may be subject to review by competent units of the group or by designated third parties, when deemed necessary.

It is prohibited to use unauthorized software and perform downloading or any other behavior that entails the risk of introducing computer viruses or any other dangerous element for computer security into the network or computer equipment and which may also entail a violation.

of intellectual property rights.

Employees and managers may not use the company's funds or cards to fund actions that are not typical of their professional activity.

The intellectual and industrial property resulting from the work of the employees during their time in any JEALSA entity, and connected to their present and future businesses, will be owned by JEALSA.

n) Confidentiality and data protection.

All employees must process all the information they know by virtue of their job confidentially. Therefore, any type of transmission and misuse of that information internally and with third parties is prohibited.

The obligation of confidentiality will remain in force once the activity in JEALSA has concluded and will include the obligation to return any material related to JEALSA that the employee has in their possession at the time of the termination of their employment relationship.

JEALSA will rigorously apply the regulations contained in the Organic Law on Personal Data Protection (LOPD), and requires of its entire staff the same rigor in terms of obligations derived from the same. The importance of this matter means that there is a company policy to that effect and specific protocols for personal data protection. Therefore, employees will notify the corresponding department or area of any incident they detect related to personal data protection.

JEALSA employees must know and respect all internal procedures regarding storage, custody, and access to data, which are intended to ensure different levels of security.

JEALSA employees must respect the personal and family privacy of all those whose data they have access to in the exercise of their working activities, and must strictly comply with the legal or internal rules established to ensure the appropriate processing of information and data provided to the company by third parties.

4.- COMPLIANCE WITH THE CODE.

All employees must ensure correct compliance with this Code of Ethics and Conduct. Likewise, the administrators and directors will strive to disseminate and enforce its preventions.

However, it is necessary to have a specific and specialized body that manages all the issues and problems that may arise on a recurring basis. To the extent

that organizational circumstances do not demand the creation of a specific Ethics Committee separate from the Compliance Committee, the latter will exercise the functions of the Ethics Committee in connection to this Code.

When the Compliance Committee acts as an Ethics Committee, it may act on its own initiative or at the request of any employee of JEALSA or third parties with whom JEALSA has a direct relationship and a commercial or professional interest, through a complaint made in good faith.

Violation of this Code by any employee will entail disciplinary action in the terms regulated internally and in the Workers' Statute, collective agreements, and other concordant regulations that may apply.

Any matter regarding the Code, whether they be allegations of non-compliance or queries regarding its interpretation, may be sent to JEALSA through any of the following means:

- Through the form available at the corporate website <https://jealsa.com/compliance/>.
- Following a whistleblower's request, it can also be submitted through an in-person meeting in the following seven days. If needed, the whistleblower will be warned that the communication will be recorded and they will be informed that their data will be treated according to the Regulation (UE) 2016/679 of the European Parliament and of the Council of the 27th April 2016 and the Organic Law of Protection of Data in force at the relevant moment.

The aforementioned channels are to be applied in all national and international JEALSA's subsidiaries, in addition, in the Spanish territory the Law 2/2023, 20th February, of protection of the people who inform about normative infringements, will apply.

JEALSA ensure the anonymity of the users of the complaints channel.

The Compliance Committee, which will exercise the functions of the Ethics Committee, constitutes a JEALSA body that will report only to the Board of Directors, and with the following functions:

- Promote the dissemination of, knowledge of, and compliance with the Code of Ethics and Conduct, as well as other compliance and anti-bribery policies.
- Interpret the Code of Ethics and Conduct, as well as other compliance and anti-bribery policies, and guide the actions of employees or third parties in case of any doubt.
- Manage conflict resolution related to the application of the Code of Ethics and Conduct, as well as other compliance and anti-

bribery policies.

- Facilitate and manage a communication pathway to all employees, suppliers, and collaborating companies for undertaking, in good faith and without fear of reprisals, any inquiries or communications of violations of the Code, as well as other compliance and anti-bribery policies, or any other related issue.
- Draft reports for the Board of Directors about the dissemination of and compliance with the Code of Ethics and Conduct, as well as other compliance and anti-bribery policies, by preparing recommendations or appropriate proposals to keep it updated, improve its content, and facilitate the application of aspects that require special consideration.
- The supervision of the Complaints Channel and compliance with its principles and procedures, that are provided in the ‘Ethical Channel management policy and management manual’.
- Any other roles that are described in the Corporate Compliance Manual.

The Ethics Committee will guarantee:

- The confidentiality of all data and records handled and the actions carried out, unless by law or judicial order, it is necessary to transfer information.
- The exhaustive analysis of any data, information, or document based on which its use is promoted.
- The instruction of a procedure according to the circumstances of the case, which will always act independently and with full respect for the right to a hearing and the presumption of innocence of any affected person.
- The indemnity of any complainant as a result of the submission of requests or complaints in good faith to the Committee.
- In broader terms, the compliance with the provisions of the Law 2/2023, 20th of February.

The Ethics Committee will have the means necessary to ensure the application of this Code.

The decisions of the Ethics Committee will be binding for JEALSA and all its employees.

5.- VALIDITY AND PUBLICITY OF THE CODE.

This Manual comes into force on the day of its approval by the Board of Directors and will stay in effect as long as it is not agreed override it. It may

be reviewed and updated periodically by the Board of Directors at the proposal of the Compliance Committee, which will take into account the suggestions and proposals made by employees as well as the different national and international regulations that are approved in terms of good corporate governance and the prevention of corruption and illegal practices.

The final approval of each one of the updates of the Code will be carried out by the Board of Directors.

This Code will be sent to all JEALSA Group employees and will be subject to the appropriate communication, training, and awareness actions to be appropriately understood and put into practice.

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Code of Ethics and Conduct approved by the Board of Directors of CORPORACIÓN EMPRESARIAL JEALSA, S.L. for all its subsidiaries, national and international, in A session held on 2 April 2024.