

Monells
SABOR Y TRADICIÓN



EMBUTIDOS MONELLS
DESDE
1979

CODE OF ETHICS AND BUSINESS CONDUCT



Table of contents

1

Presentation

2

Scope and application

3

Principles of Embutidos Monells' Code of Ethics



Human and employment rights



Environment



Anti-corruption



Health and Safety

4

Global principles of Embutidos Monells' Code of Conduct

4.1 Commitment to the Organisation

4.2 Commitment to the Human Resources Team

4.3 Commitment to customers and/or consumers

4.4 Commitment to suppliers and distributors

4.5 Commitment to the Competition

4.6 Commitment to the Social Environment

4.7 Commitment to Applicable Law

4.8 Commitment to Shareholders

5

Contact

1 - Presentation

2 - Scope and application

3 - Embutidos Monells'
Code of Ethics

4 - Global principles of the
Code of Conduct



1

Presentation



Embutidos Monells SA's Code of Ethics and Conduct aims to guarantee responsible behaviour in the development of its activities beyond mere compliance with the law.

This code serves as a guide, establishing the principles and ethical considerations that **EMBUTIDOS MONELLS** follows in its relationship with stakeholders and the environment. It aims to guide daily decisions in order to establish relationships based on commitment, dialogue, efficiency, integrity, respect, responsibility, transparency and dedication to service.



1 - Presentation

2 - Scope and application

3 - Embutidos Monells'
Code of Ethics

4 - Global principles of the
Code of Conduct



2

Scope and application

This **Code of Ethics and Conduct** is an initiative of the company's Senior Management, by whom it has been created, drafted and disseminated to stakeholders. Senior management is committed to reviewing and resolving any related concerns and ensuring its application in all company activities.

It is the responsibility of all staff, regardless of their functions, workplace or hierarchical level, to comply with it and to report any action that may alter or breach it through the established channels of communication.

This document complements the terms and conditions of the contracts signed between EMBUTIDOS MONELLS and the interested parties. It does not exempt any party from its responsibility to comply with the applicable legislation, regulations and professional standards, as well as the best business practices.



In case of violation, **EMBUTIDOS MONELLS** undertakes to act immediately, carrying out a thorough investigation and analysis and proposing the appropriate corrective measures and may apply the sanctions indicated in the collective agreement, which may include the termination of the employment relationship.

Such measures shall also apply to anyone who orders, approves or has knowledge of violations and fails to act immediately to correct them.

Anonymous complaints will be dealt with diligently by an Investigation Commission. In no case will the complainant be penalised. However, strict action will be taken against complaints made in proven bad faith that turn out to be false or irresponsible. The Investigation Commission will deal with each case with discretion, protecting the identity of the complainant and the circumstances reported until it gets to the root of the problem.

The Code of Ethics and Conduct comes into force on 06/06/2024 and will remain in force until its cancellation or modification is approved.



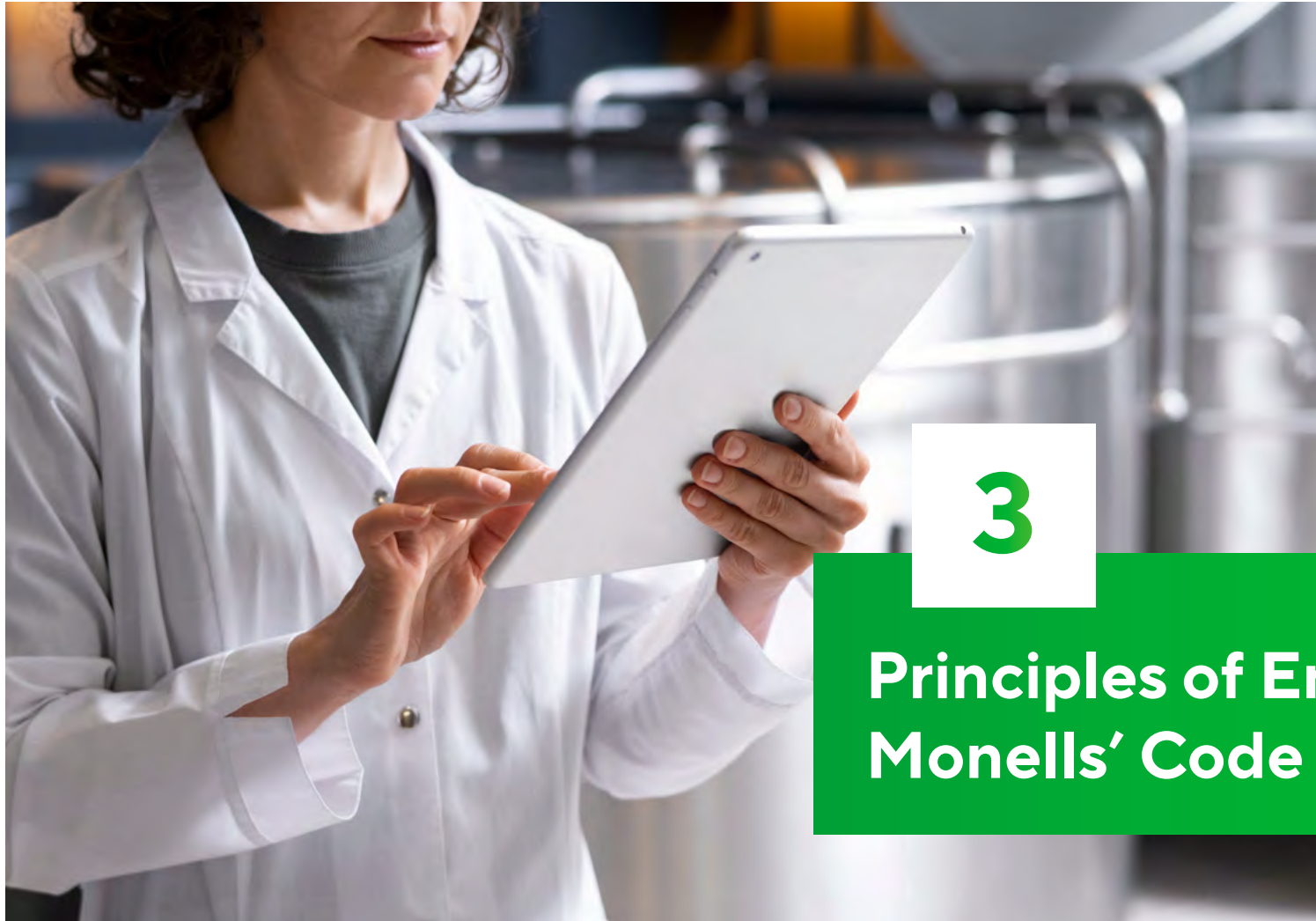
The identity of the complainant and the circumstances reported will be protected until the root of the problem has been addressed.

1 - Presentation

2 - Scope and application

3 - Embutidos Monells'
Code of Ethics

4 - Global principles of the
Code of Conduct



3

Principles of Embutidos Monells' Code of Ethics



— Support and respect the protection of internationally proclaimed **human rights**, ensuring that the company is not complicit in their violation.

— Observe the **right of association**, right to trade union membership and collective bargaining without discrimination.

— Support the **elimination of forced or compulsory labour**.

— Support the **eradication of child labour**, not hiring children under the age of 16.

— Support the **abolition of discriminatory practices** in employment and occupation.

— **Encourage respect** for individual, cultural and role-playing differences.





- Maintain a **preventive approach** to minimise the environmental impact of its activities.
- **Encourage initiatives** that promote environmental responsibility and the development of sustainable technologies.



- **Combat corruption in all its forms**, including extortion and bribery.
- **Prohibit bribery and undue influence** in business transactions.



- Provide a **safe and healthy working environment**, complying with all applicable laws and regulations.
- Promote **occupational health and safety** and work-life balance.

1 - Presentation

2 - Scope and application

3 - Embutidos Monell's
Code of Ethics

4 - Global principles of the
Code of Conduct



Global principles of Embutidos Monells' Code of Conduct

4.1 Commitment to the Organisation

DISCRIMINATION AND HARASSMENT

Embutidos Monells bases its behaviour on the principle of equality and non-discrimination and rejects any form of intimidation, violence, physical, sexual, psychological, or moral harassment or abuse of authority, both in the workplace and on business trips or social events related to the work activity.

Embutidos Monells, its suppliers and customers must maintain a professional and respectful working environment, treat all workers with dignity and not subject them to degrading conditions, discrimination or harassment. They should promote equal opportunities and not tolerate harassment and retaliation for reporting wrongdoing.

The company has a protocol for the prevention and tackling of sexual harassment and harassment for reasons of sex HR-P-012, which is available to all personnel who carry out activities or provide services in Embutidos Monells.



CONFLICT OF INTEREST

All personnel must give priority to the interests of Embutidos Monells over their personal interests or those of third parties that may influence decisions, actions, services or others carried out on behalf of the company.

Employees of Embutidos Monells or its representatives are prohibited from accepting gifts or presents beyond those considered business courtesies (such as pens or calendars) and which in a period of one year do not exceed €60 per supplier. The line manager must approve invitations to events or travel.

To avoid conflicts of interest, the company maintains absolute political neutrality.

Interested parties shall immediately inform Embutidos Monells of any potential conflict of interest in relation to business with Embutidos Monells.

CORRUPTION

Suppliers, customers or employees of the company must not offer or accept bribes or influence others to do so on their behalf. Offering, giving, soliciting or receiving bribes, providing anything of value to gain an unfair advantage, and making inducement payments are prohibited. Suppliers must make reasonable efforts to prevent bribery and support efforts to combat corruption. Stakeholders shall at least comply with applicable local and national laws, and evidence of compliance may be required.

MONEY LAUNDERING

Embutidos Monells complies with the anti-money laundering laws applicable to its activities. In the business relations of Embutidos Monells, all employees must pay special attention to any indication of activities related to money laundering.

CONFIDENTIALITY AND PERSONAL DATA PROTECTION

All employees of Embutidos Monells must be cautious, prudent and discreet with the information to which they have access, especially personal data.

They must guarantee the strictest professional secrecy and refrain from providing third parties with information that could harm the company or its stakeholders or violate personal data protection legislation.

Embutidos Monells respects the right to privacy of its employees and undertakes not to disclose their personal data without their consent, except for legal obligation or compliance with judicial or administrative resolutions.

Employees who, in the course of their work, have access to the personal data of other employees must keep such information confidential.

Any employee or former employee has the right of access, opposition, rectification and cancellation of their personal data in accordance with current legislation.

Stakeholders should protect and handle personal and/or confidential information appropriately, using this information strictly for the authorised purpose. Suppliers must immediately inform Embutidos Monells in case of any incident involving unauthorised access, disclosure or (potential) loss of such information, including, but not limited to, theft, damage, destruction, attempted cyber attack, ransomware, etc.

INTELLECTUAL PROPERTY AND COMPANY KNOW-HOW

All employees must maintain the confidentiality of the company's activities.

Interested parties must not carry out operations, transactions or speculations with privileged and confidential information obtained from their relations with Embutidos Monells.



4.2 Commitment to the Human Team

EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

Embutidos Monells recruits, hires, trains and promotes employees on the basis of an egalitarian process with clear criteria of capacity, competence and professional merit. We seek their satisfaction and fulfilment, promoting their personal and professional development and encouraging their involvement in improving their own skills and competences.

Embutidos Monells has an equality plan that establishes the guidelines to avoid any discrimination based on age, race, sex, ideology, religion, nationality, social origin, sexual orientation, political opinions or any other personal, physical or social condition of its workers.

It also promotes equal treatment between men and women in access to employment, training, promotion and working conditions.

RECONCILIATION OF WORK AND PERSONAL LIFE

Embutidos Monells promotes a balance between the work and personal life of its employees, respecting their family and personal life.

SAFETY, HEALTH AND WELL-BEING AT WORK

Embutidos Monells strives to improve working conditions in order to raise the level of health and safety protection for people. It undertakes to prevent and act against those risks that may cause harm to the safety and/or health of people, avoiding those risks that can be eliminated and minimising those that cannot be avoided, providing appropriate training, supplying the necessary protective equipment and supervising and informing people of any risk situation.

All persons must follow the established safety rules and make proper use of the machines, hazardous substances, means and protective equipment provided, as well as report any dangerous situation they may observe in order to take the appropriate corrective action.

GOOD WORKING ATMOSPHERE

Embutidos Monells fosters a working environment in which people feel integrated, comfortable and respected, regardless of their personal differences, abilities or physical or psychological characteristics.



4.3 Commitment to customers and/or consumers

QUALITY, SAFETY, EXCELLENCE AND SATISFACTION

Embutidos Monells works every day to put on the market only those products that guarantee food safety (innocuousness), authenticity and quality to try to exceed the expectations of our consumers and customers to deserve and achieve their satisfaction with every bite.

RESPONSIBLE ADVERTISING AND MARKETING

Embutidos Monells' advertising must be truthful and not abuse the consumer's good faith.

Embutidos Monells protects the most vulnerable audiences and handles personal data responsibly, choosing responsible criteria for its marketing elements, the relationship with the media, and the language and tone of communications.

4.4 Commitment to suppliers and distributors

HUMAN AND LABOUR RIGHTS

Suppliers must not engage in or support human trafficking or slavery or use forced or involuntary labour. They must not employ minors and must respect workers' right to freedom of assembly.

Suppliers shall comply with all applicable regulations regarding working conditions, including the payment of the legal minimum wage.

SELECTION

Embutidos Monells selects its suppliers and subcontractors through a fair process based on technical specifications where quality, service and food safety are paramount.

Suppliers must comply with this code by communicating it to their employees and the supply chain.

RESPONSIBLE BUSINESS PRACTICES

Suppliers must operate legally and ensure compliance with applicable legislation. They must train their staff in ethical business practices and avoid subcontracting without the approval of Embutidos Monells. Suppliers must designate a senior member of management responsible for code compliance.

STABILITY AND INTEGRITY

Embutidos Monells seeks long-lasting relationships with suppliers and distributors, respecting their interests and avoiding practices that may interfere with their commercial decisions.

SOCIAL NETWORKS

Suppliers must not act in the name of Embutidos Monells or use its brand without express authorisation.

ENVIRONMENT

Embutidos Monells encourages suppliers to improve energy efficiency and reduce the consumption of natural resources, promoting ecological practices and compliance with environmental laws.

4.5 Commitment to competition

FAIR COMPETITION AND FREE MARKETS

Embutidos Monells respects the property rights of its competitors and encourages the resolution of disputes through agreements and arbitration. It does not use improper actions to gather information about its competitors, nor does it disseminate false or biased information.

COOPERATION AND PARTNERSHIPS

Embutidos Monells encourages participation in associations and forums of common interest to exchange experiences and promote improvements in responsible management and sustainable development.

4.6 Commitment to the Social Environment

COLLABORATION

Embutidos Monells is committed to actively collaborating with its environment, contributing to economic and social development in the geographical areas where it operates.



4.7 Commitment to Applicable Law

PUBLIC-PRIVATE PARTNERSHIPS AND COLLABORATION

Embutidos Monells establishes channels of communication and dialogue with the Administrations to cooperate in the development of a culture of social responsibility.

COMPLIANCE WITH LEGISLATION AND CRIME PREVENTION

Embutidos Monells undertakes to know and comply with the applicable legislation in the countries where it operates, responding truthfully and transparently to the requirements of any Administration.

Promotes the training and awareness of its employees to ensure compliance with legal obligations and crime prevention.

All the actions developed by Embutidos Monells are based on an attitude of transparency, respect, professionalism and honesty towards all stakeholders, including the authorities.

4.8 Commitment to Shareholders

GOOD GOVERNANCE, OWNERSHIP AND MANAGEMENT

Embutidos Monells' relationship with its investors follows the principles of truthfulness, transparency, loyalty and sustainable value creation. We are committed to making public and accessible the company's results in the three pillars of sustainability: economic, social and environmental.





Violations of these commitments, as well as any indication of corruption, bribery or other unlawful practices, can be reported through the physical mailboxes available at the factories or through the official complaints channel, the link to which can be found on our website, the “Complaints Channel” section, or by e-mail:

canaldenuncias@monells.es

This channel guarantees confidentiality and anonymity, protecting whistleblowers from reprisals.

The code of ethics and conduct cannot foresee all possible situations. Therefore, if you have any ethical concerns, you should ask yourself the following questions:

Is it legal?

Is it honest and fair?

Is it consistent with the values and principles of Embutidos Monells?

Would I feel comfortable if it were made public?

If the answer to any of these questions is no, or if you are in doubt, ask your manager, your department head or your HR manager for help.



**CODE OF ETHICS AND
BUSINESS CONDUCT
2024**