

Compliance system:  
Code of Conduct.



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28/04/2026



**CONTENTS:**

<b>0. INTRODUCTION</b> .....	<b>2</b>
<b>1. SCOPE</b> .....	<b>5</b>
<b>2. ETHICAL VALUES</b> .....	<b>6</b>
<b>3. RELATIONSHIPS WITH AND BETWEEN EMPLOYEES</b> .....	<b>8</b>
3.1. Respectful treatment and prohibition of discrimination, harassment or mistreatment at work.....	8
3.2. Guarantee of labour rights .....	8
3.3. Prohibition of child labour .....	8
3.4. Equal opportunities.....	8
3.5. Health and safety at work.....	9
<b>4. RELATIONS WITH THIRD PARTIES AND THE MARKET</b> .....	<b>10</b>
4.1. Fair competition .....	10
4.2. Ethical trade .....	10
4.3. Integrity in management .....	11
4.4. Quality.....	11
4.5. Confidentiality regarding third-party information.....	12
4.6. Transparency, value creation and corporate governance.....	12
4.7. Protection of corporate assets.....	13
4.8. Conflicts of interest.....	13
4.9. Use of information about the CONESA Group.....	14
<b>5. RELATIONSHIP WITH SOCIETY</b> .....	<b>15</b>
5.1. Relations with the authorities .....	15
5.2. Environment.....	15
5.3. Social commitment .....	15
<b>6. INTERPRETATION AND COMPLIANCE</b> .....	<b>16</b>



## **0. INTRODUCTION.**

The international community has stepped up its efforts in the fight against crime, as reflected in the adoption of various regulations and guidelines. Notable examples include:

Directive (EU) 2024/1260 of the European Parliament and of the Council, adopted on 24 April 2024, which establishes minimum standards for the recovery and confiscation of assets, strengthening Member States' capacity to trace, identify, freeze and manage assets of criminal origin.

Directive (EU) 2024/1270, adopted on 12 April 2024, which introduces criminal offences and penalties for breaches of European Union restrictive measures, ensuring the uniform and effective application of sanctions across all Member States.

Directive (EU) 2024/1280, adopted on 27 May 2024, which strengthens the rules to combat trafficking in human beings, incorporating forms of exploitation such as forced surrogacy, forced marriage and illegal adoption, and reinforcing prevention measures and support for victims.

Directive (EU) 2024/1290, adopted on 26 March 2024, which improves environmental protection through criminal law, expanding the list of environmental offences and establishing more severe penalties for offenders.

Directive (EU) 2024/1300, agreed on 9 June 2023, which harmonises penalties for breaches of EU sanctions, defining conduct that Member States must criminalise and establishing dissuasive penalties.

Furthermore, the United Nations Convention against Transnational Organised Crime and its additional protocols remain fundamental instruments in the global fight against organised crime.

These initiatives reflect the international community's ongoing commitment to strengthening the legal and operational framework in the fight against various forms of crime, adapting to new global threats and challenges.



Since its inception, the CONESA Group has demonstrated a firm ethical commitment, embodied in corporate values that are reflected throughout the organisation via the Group's mission and vision:

- Mission:

The production of primary and secondary processed tomato products, targeting the domestic and international markets within the "Industria de Conservas Vegetales", creando valor para accionistas, empleados y la general public.

We are characterised by offering our customers a wide range of quality products, distinct from the competition, and excellent service, to meet their needs and expectations.

- Vision:

To be leaders in the production of primary processed tomato products, through the quality of our products and the satisfaction of our customers.

To establish a presence in the market for other products (agro-industrial, ready meals, etc.)

CONESA Group, true to its corporate values, is committed to establishing and maintaining effective internal standards and procedures that enable:

- Conduct its activities in accordance with strict ethical standards and the current legal framework.
- Implementing codes of conduct and control and communication systems designed to prevent its operations from being used for unlawful purposes.
- Ensure that all its employees comply with policies and procedures relating to the prevention of unlawful acts.

CONESA Group's managers and employees are responsible for identifying and reporting suspicious transactions that may constitute illegal activities, immediately informing the designated internal bodies in accordance with specific policies and procedures. These bodies, in turn, will notify the competent authorities as required by applicable regulations.



## CONESA Group Code of Conduct.

MG\_AX4 Rev 2(  
28/04/2026)  
Page4 of 17

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Adherence to this policy is essential to ensure that all areas of the CONESA Group fully comply with current legislation. This policy is mandatory for all CONESA Group employees, who must embrace it and play an active role in its implementation and development.

We thank you in advance for your support of this Policy.

At Villafranco del Gadiana, on 29 April 2026.

Signed: Manuel Vázquez Calleja.

CEO, CONESA Group



## **1. SCOPE OF APPLICATION.**

This Code is binding on the following persons and entities:

- A los miembros del Consejo de Administración de Grupo Empresarial CONESA S.L. and the governing bodies of all companies belonging to the Group.

For these purposes, the following companies are considered to be included within the definition of the Group:

- Grupo Empresarial CONESA S.L.
  - Conservas Vegetales de Extremadura S.A.
  - Agraz S.A.U.
  - Roma S.L.
  - CONESA Vegas Altas S.L.U.
  - CONESA Andalusia
  - CONESA Portugal S.A.
- A the members of the CONESA Group Management Team.
  - A todos los empleados que desempeñan su trabajo en cualquiera de las companies companies
  - A The CONESA Group and all its member companies, regardless of the business sector or geographical location of said companies and their activities.



### 2. 'S VALUES AND ETHICS.

Managers and employees, both in the actions they undertake as a result of their association with the CONESA Group and in those where such actions could be interpreted as attributable to the CONESA Group or could affect its reputation, must comply with the Code, which is based on ethical values, amongst which those that are key to the CONESA Group's culture must be highlighted:

- **RESULTS-ORIENTATION**, because results are essential for the continuity and growth of the company.
- **CUSTOMER FOCUS**, with a commitment to service, as our customers' satisfaction is our guarantee for the future.
- **COMMITMENT**, to a job well done with reliability, prudence and seriousness towards the company, our own work, people, customers and suppliers.
- **RESPONSIBILITY**, understood as our ability to accept the consequences of our actions. We are responsible in our dealings with colleagues and customers.
- **EXEMPLARY BEHAVIOUR**, because the conduct of each individual, and especially that of managers, is observed by others and constitutes an important motivational factor.
- **HONESTY**, because we act in accordance with what is expected of us as fair-minded people who honour our commitments and maintain the utmost respect for the principles and values that guide us.
- **TEAMWORK**, because the best way to achieve our objectives is through mutual support and the sharing of knowledge to solve common problems, in an atmosphere of camaraderie and solidarity, strengthening us both as individuals and as a company.
- **DISCIPLINE**, understood as the ability to act in an orderly and persevering manner to achieve established objectives.



- **RESPECT**, for everyone who works at CONESA, valuing and respecting (without interfering) the diverse roles and opinions we each hold, as this attitude helps build confidence in oneself and in others.
- **TRANSPARENCY OF INFORMATION**: we aim to ensure that everyone feels well-informed regarding their work and the company's progress.
- **INITIATIVE/INNOVATION/CREATIVITY**, because an entrepreneurial spirit, openness to change and the ability to anticipate customer needs drive the company's progress and the professional development of its people.
- **RESPECT FOR THE ENVIRONMENT**: as we understand that environmental considerations are a strategic factor in sustainable development, we contribute to preserving natural resources as a vital asset for future generations.

Ensuring compliance with this commitment to ethical behaviour requires Responsible Conduct, which demands:

- Responsibility in actions, both institutional and individual, strictly in line with the principles and criteria of the Code.
- A responsible attitude, which involves employees in identifying, immediately reporting and, where appropriate, resolving ethically questionable actions.

The CONESA Group believes that the widespread application of the aforementioned ethical values, and those implicit in the Code, to all types of business practices must contribute effectively to the development of the societies in which they take root.



### **3. RELATIONSHIP BETWEEN AND WITHIN THE CONESA GROUP AND ITS EMPLOYEES.**

The relationship between the Group and its employees, and that between employees themselves, shall be based on compliance with the following commitments:

#### **3.1. Respectful treatment and a ban on discrimination, harassment or mistreatment in the workplace.**

Treating employees with dignity, respect and fairness, taking into account their different cultural sensitivities.

Not to discriminate against employees on the grounds of race, religion, age, nationality, gender or any other personal or social condition unrelated to their merit and ability.

Not to permit any form of violence, harassment or abuse in the workplace.

#### **3.2. Guarantee of human and labour rights.**

Recognise the rights of association, unionisation and collective bargaining. CONESA Group will adopt an open attitude towards trade union activities.

#### **3.3. Prohibition of child labour and forced labour.**

CONESA Group does not tolerate child labour. CONESA Group will not use child labour or incorporate any products or services derived from it into its business activities, and will ensure compliance with the provisions of the International Labour Organisation (ILO) regarding the employment of minors. CONESA Group requires all its employees and suppliers to strictly observe this principle.

#### **3.4. Equality and equal opportunities.**

All employees shall enjoy equal opportunities for the development of their professional careers. CONESA Group is committed to establishing an effective equal opportunities policy so that its employees may carry out their professional activities on the basis of merit. Promotion decisions shall always be based on objective circumstances and assessments. Furthermore, CONESA Group is committed to maintaining a policy of investment in the personal and professional learning and training of its employees.



CONESA Group employees shall respect the equal opportunities policy in their professional sphere and support the personal and professional development of their colleagues.

### **3.5. Health and safety at work.**

CONESA Group will provide its employees with a safe and stable working environment and undertakes to continuously update occupational risk prevention measures, as well as to scrupulously comply with the applicable regulations in this area in all locations where it carries out its business activities.

All employees are responsible for ensuring strict compliance with health and safety regulations. Furthermore, they must make responsible use of the equipment assigned to them when carrying out high-risk activities, share their knowledge with colleagues and subordinates, and promote compliance with risk prevention practices.

CONESA Group will ensure:

- To foster the development, training and professional advancement of employees.
- To link employees' remuneration and promotion to their merit and ability.
- A fair wage, respecting, as a minimum, the provisions of the collective agreement.
- A contract in accordance with the labour legislation in force at all times for all workers.
- To ensure health and safety at work, taking all reasonable measures to maximise the prevention of occupational risks.
- To promote a healthy work-life balance for employees.
- To promote the employment of people with disabilities or impairments, removing all barriers within the company to their integration.
- To facilitate employees' participation in the company's social action programmes.

## **4. RELATIONS WITH THIRD PARTIES AND THE MARKET.**

CONESA Group and its employees shall base their relationships with customers, suppliers, competitors and partners, as well as with their shareholders, investors and other market players, on the principles of integrity, professionalism and transparency.

### **4.1. ly fair competition.**

CONESA Group prohibits any conduct involving unfair competition and undertakes to ensure compliance with the competition laws applicable in the countries where it operates.

CONESA Group seeks commercial relationships based on the free market, which serve to uphold its own values without disparaging those of others, and which are always for the benefit of all stakeholders.

We strive to maintain good relations with competitors in order to share best practices, exchange experiences and improve the products and services we offer.

### **4.2. r ethical trade.**

CONESA Group will seek to establish mutually beneficial partnerships and relationships, based on trust, honesty, loyalty, the exchange of knowledge and integration, in order to:

- Support suppliers, so that their supplies improve for the benefit of both parties.
- Create and maximise value between the parties.
- Support mutual development.
- Ensure that the cultures of both parties are compatible.

Transparency in relationships and fairness in dealings are fundamental values for our organisation.

When selecting suppliers, CONESA Group undertakes to:

- Seek out and select suppliers whose business practices respect human dignity, do not breach the law and do not jeopardise the company's reputation.



- Selecting suppliers based on the suitability of their products or services, as well as their price, delivery terms and quality.
- Strive for excellence in the company's service, so that customers and consumers receive the quality they expect.
- Guarantee the company's products and services and deal with complaints from consumers and users quickly and effectively, seeking their satisfaction beyond mere compliance with current regulations.
- Cooperate with the farmers who supply raw materials to our factories to ensure that everything has been grown in a sustainable and environmentally friendly manner.

All suppliers must provide evidence that they comply with the conditions set out in this Code, in accordance with the procedures established by the CONESA Group.

### **4.3. Integrity in business management.**

CONESA Group prohibits bribery of public authorities and officials and forbids its employees from giving to third parties or receiving from third parties any improper payments of any kind, or gifts, gratuities or favours that are outside market practice or which, due to their value, characteristics or circumstances, could reasonably influence the conduct of the commercial, administrative or professional relationships in which its companies are involved.

### **4.4. Quality.**

CONESA Group establishes the pursuit of quality in its products as a guiding principle of its business conduct and will provide its employees with the necessary resources to develop the most appropriate quality management systems at all times. CONESA Group will strive to meet its customers' expectations to the highest standard and will make every effort to anticipate their needs.

All raw materials used in CONESA Group's operations comply with the combination of requirements set out in the product specifications, CONESA Group's policy and this Code of Ethics.

CONESA Group places customers at the heart of its business, with the aim of establishing lasting relationships with them based on the mutual provision of value and mutual trust.



CONESA Group is committed to the continuous review of its organisational processes to improve customer care and service.

#### **4.5. Confidentiality regarding information belonging to the CONESA Group and third parties.**

CONESA Group guarantees that it will respect the confidentiality and privacy of any third-party data in its possession and undertakes to preserve the confidentiality of such data, except where required by law, administrative or judicial obligations to disclose it to organisations or individuals or to make it public. Furthermore, CONESA Group guarantees the right of affected third parties to access and request the modification or rectification of data where necessary. The Group's employees, in the course of their professional activities, shall maintain the confidentiality of the data in accordance with the terms set out above and shall refrain from any inappropriate use of this information.

CONESA Group considers that one of the key elements underpinning its customers' trust is the appropriate safeguarding of their information and the effective restriction of its use in accordance with the applicable legal provisions in each case.

The non-public information held by CONESA Group regarding its clients and their transactions is confidential. Accordingly, it has adopted rules and procedures to:

Ensure secure access to its computer systems and to the physical files in which its customers' contractual and transactional documentation is stored.

Comply with legal requirements regarding the protection of personal data.

Employees who, by virtue of their position or professional activity, have access to client information are responsible for its safekeeping and appropriate use.

#### **4.6. Transparency, value creation and corporate governance.**

CONESA Group adopts as a guiding principle of its corporate conduct towards its shareholders, investors, analysts and the market in general, the provision of information that is truthful, complete and presents a true and fair view of the company and the Group, its business activities and its business strategies.



Communication shall always be carried out in accordance with the rules and within the timeframes established by the legislation in force in each case. Business activities and strategic decisions shall focus on creating value for its shareholders, transparency in its management, the adoption of best corporate governance practices within its companies, and strict compliance with the regulations in force at any given time in this area.

CONESA Group is committed to providing its customers with timely, accurate and comprehensible information regarding its operations, as well as clear and truthful information on:

The key features of the products and services it offers or supplies.

The procedures established within the Group for handling complaints and resolving incidents.

This commitment requires particular diligence in the professional conduct of all those responsible for maintaining customer information processes and systems, in the personal handling of their requests for information, and in the resolution of their complaints.

#### **4.7. Protection of the Group's assets and business patrimo .**

The CONESA Group and its employees shall always seek to provide the best possible protection for all assets and rights constituting the assets of the group's companies, whilst preserving the confidentiality of information relating thereto, which may only be used in connection with the company's activities. Employees are responsible for protecting the assets entrusted to them and safeguarding them from any loss, damage, theft or unlawful or dishonest use.

#### **4.8. f interest.**

All CONESA Group employees must avoid situations that may give rise to a conflict between their personal interests and those of the CONESA Group, and must refrain from representing the company or intervening in or influencing decision-making in which, directly or indirectly, they themselves or a third party linked to them by any significant financial, family or professional relationship has a personal interest.

Employees who find themselves in a conflict of interest must report this to their line manager. Conflicts between personal and business interests shall always be resolved in favour of the interests of the companies within the CONESA Group.



**4.9. Use of information regarding CONESA and th .**

The CONESA Group requires its employees to make discreet and professional use of the company information to which they have access in the course of their work, and to limit its use to the company's own activities; it undertakes to establish management systems focused on upholding this principle.



## **5. RELATIONSHIP WITH THE SOCIETY.**

### **5.1. Relationship with public authorities.**

CONESA Group, in addition to complying with all tax, labour and regulatory obligations established by current legislation, shall at all times be prepared to respond to requests for information from public authorities, whether national or foreign, regardless of the administrative level from which they originate, providing such information with the required promptness and detail, whilst maintaining a collaborative and respectful relationship at all times.

CONESA Group will always uphold the principle of political neutrality, although it will participate, either directly or through business organisations, in the drafting of laws, regulations or other legislation that may affect its legitimate interests.

### **5.2. Enviro .**

CONESA Group is committed to ensuring the utmost respect for the environment in the conduct of its activities, as well as to minimising any negative effects these may eventually cause. It will provide its employees with the most appropriate means to this end and will listen to local communities when making decisions that affect them and the consequences that may arise for the development of future generations.

Likewise, CONESA Group will contribute to the conservation of natural resources and of areas of ecological, scenic, scientific or cultural interest. To this end, it will establish best practices and promote awareness and use of these among its employees. CONESA Group is committed to strict compliance with applicable environmental legislation.

### **5.3. 's social commitment.**

CONESA Group is committed to acting in a socially responsible manner, complying with the laws of the countries in which it operates and, in particular, assumes the responsibility to respect cultural diversity and the customs and principles prevailing amongst the people and communities affected by its activities.



## **6. INTERPRETATION AND COMPLIANCE.**

This Code sets out the principles and commitments to business ethics that CONESA Group and its employees must respect and comply with in the course of their work.

Any employee who has knowledge of or a well-founded suspicion of a breach of this Code may bring it to the attention of their line manager or report it through the mechanisms established by the company for making suggestions and complaints. CONESA Group guarantees that all communications received will be treated with the utmost confidentiality and that the necessary measures will be taken to protect the whistleblower acting in good faith against any form of retaliation, in compliance with Law 2/2023 of 20 February, regulating the protection of persons reporting regulatory breaches and combating corruption.

Any breach or non-compliance with this Code constituting a disciplinary offence will be sanctioned in accordance with current regulations, without prejudice to any other liabilities the offender may have incurred.

To ensure compliance with this Code, resolve incidents or queries regarding its interpretation, and adopt appropriate measures to improve compliance, a Secure Channel has been established, accessible to both employees and other stakeholders, via our website [www.conesagroup.com](http://www.conesagroup.com)

This channel includes mechanisms to guarantee the confidentiality of the information provided and the protection of the whistleblower against reprisals. Furthermore, it allows complaints to be submitted anonymously, ensuring that all communications are handled impartially and diligently.

The CONESA Group undertakes to inform the complainant that the complaint has been received within a maximum of seven calendar days and to process and investigate the complaints received within a period not exceeding three months, in accordance with the provisions of current legislation.



At Villafranco del Gadiana, on 29 April 2026.

Manuel Vázquez Calleja.

Managing Director of CONESA Group.