

ANTI-CORRUPTION POLICY

FARMHISPANIA GROUP



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FIRST EDITION

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1. INTRODUCTION

Through this Anti-Bribery and Anti-Corruption Policy, the Farmhispania Group endorses the principles and standards on Anti-Bribery and Anti-Corruption (ABAC). This Policy expresses our zero tolerance for any form of corruption and our firm commitment to uphold the values reflected in our Code of Conduct.

2. LEGAL FRAMEWORK

In Resolution 58/4 of 31 October 2003, the United Nations General Assembly adopted the United Nations Convention against Corruption as the basis for developing and implementing anti-corruption policies, both in private enterprises and at a public level.

3. OBJECTIVE

The Farmhispania Group is committed to the values and objectives of the United Nations Convention against Corruption and approves this Anti-Corruption Policy in order to detect and reject any possible fraudulent behaviour and conduct infringing the anti-bribery regulations and laws in force.

4. SCOPE OF APPLICATION

The following policy is applicable to all the employees of the Farmhispania Group as well as its business partners.

5. PRINCIPLES FOR ACTION

5.1. CONFLICT OF INTEREST

A conflict of interest occurs when the personal, social, economic or political interests of an employee or collaborator or the interests of a third party interfere with the company's interests. In this situation, it could be difficult for the employee to act fully in the best interests of the Farmhispania Group.

Personal interests must never compromise the company's interests. No person or enterprise may unfairly benefit from the Farmhispania Group through an employee or the position he/she holds. Any action by an employee to his or her own actual or potential benefit is strictly prohibited.

In the event a conflict of interest arises or an employee is faced with a situation that could involve or give rise to a conflict of interest, the employee must report it as described in point 7 of this Policy in order to resolve the situation in a fair and transparent manner.

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Situations that could lead to a conflict of interest:

- If the employee or a member of his/her family has a substantial financial interest in a supplier, competitor or customer of the Farmhispania Group.
- If the employee or a member of his/her family has an interest in a transaction that he/she knows the Farmhispania Group is, or could be, interested in; or
- If the employee or a member of his/her family receives fees, commission or any other compensation from a supplier, competitor or customer of the Farmhispania Group.

5.2. EXTERNAL ACTIVITIES

No activities outside the Farmhispania Group may be carried out without the company's written authorisation if they interfere with the employees' duties, they imply a risk to the Farmhispania Group's reputation or are otherwise in conflict with its interests. It is forbidden to work for a competitor, customer or supplier of the Farmhispania Group, since this would result in an actual or potential conflict of interest. For the avoidance of doubt about the possible interference of an external activity with the activities performed for the Farmhispania Group, the employee or collaborator must contact the Company to settle such doubt and, if necessary, request authorisation to perform the external activity.

5.3. GIFTS, FAVOURS, INVITATIONS, HOSPITALITY AND OTHER ITEMS OF VALUE

Employees should avoid any conduct that could have the appearance of unfair influence and should hence:

- Ensure that all gifts, hospitality, invitations, entertainment or other privileges given or received in connection with their work activities are appropriate for the circumstances and moderate in terms of their value, frequency and amount. If received, these should be reported to the company through the chain of command.
- Refuse gifts, invitations and hospitality that are intended to be favours or influence a decision, expressing this politely and explaining the company's rules in this respect.
- Never give or receive gifts, entertainment or other privileges, whether in cash or cash equivalents, which could create the appearance of obtaining or retaining an unfair personal, employment privilege or an unfair action that could create a conflict of interest for either party.
- Ensure that any political, charitable or similar contributions comply with applicable laws and Farmhispania's policy requirements and are not used for any illegal or unfair purpose.

If in doubt, think and act with common sense and, if necessary, seek advice from your Line Manager, Human Resources, the Legal Department, the Works Council or any of them by observing the hierarchical level.

5.4. PERSONAL RELATIONS, FAMILIES AND RELATIVES

Our recruitment and staff development decisions must be fair and objective. Immediate family members, partners or friends of employees may be recruited as employees, hired as suppliers, become creditors or consultants on the basis of their qualifications, performance, competencies, skills and experience and providing there is no direct employment relationship between the employee and them. These recruitment decisions must always be based on the aforementioned parameters and the suitability of the candidates for the job.

These principles of fair recruitment are applicable to all the aspects of the employment relationship, including remuneration, promotion, training, transfers and when the relationship is developed after the employee has joined the company.

The children of the Farmhispania Group's employees will be given priority for summer jobs, preventive work stoppages, training periods, holiday employment, temporary sick, paternity or maternity leave replacements and short-term tasks of a similar nature, providing they are at least as suitable as other candidates.

These personal relationships at work should not influence the employees' ability to act in the company's best interest and should not affect our working relationship.

Remember and ensure that, if you are in doubt as to whether or not your relationship with a supplier, creditor, customer, relative, friend, etc. could influence your decision-making, your ability to act in the company's best interests or could create a problem, you should consult your Line Manager, Human Resources, Legal Department or Works Council, applying the hierarchical level of action.

5.5. RELATIONS IN THE POLITICAL AND SOCIAL SPHERE

The Farmhispania Group recognises the right of its collaborators to participate, in a private capacity, in clubs, associations, political parties and other social, political or cultural institutions that pursue legally permitted objectives. However, such participation must never jeopardise fulfilment of the obligations that the collaborators have undertaken with the Farmhispania Group, nor must it have any repercussions on its reputation or image. Therefore, when collaborators express private opinions in the social, political or cultural sphere, they must not refer to their position in the Farmhispania Group, unless expressly authorised to do so by the Company.

Donations or contributions to political parties, trade unions and other related institutions may only be made when permitted by applicable laws and regulations and providing their objectives are compatible with the values set out in our Code of Conduct.

5.6. ANTI-BRIBERY

The Farmhispania Group is committed to transparency and accountability in its business and prohibits any form of bribery or corruption or any other form of business conduct that could create the appearance of unfair influence.

The employees, either directly or through intermediaries, may never offer or promise an unfair personal or financial favour from a public or private third party aimed at obtaining or securing business or an advantage. Nor should employees accept such an advantage in exchange for obtaining preferential treatment from a third party.

The employees should be aware that offering or giving unfair benefits in order to influence the recipient's decision could not only result in disciplinary sanctions but may also have criminal consequences.

5.7. BRIBERY OR CORRUPTION OF A PUBLIC OFFICIAL

The Farmhispania Group rejects any act in which an employee offers remuneration of any kind to an authority, public official or person involved in performing a public function in order to carry out any action that is against the duties inherent to his/her position.

5.8. FAIR COMPETITION

The Farmhispania Group expresses its commitment to compete in the markets with integrity, fairness and honesty; thus promoting respect for free competition to the benefit of society and all consumers.

6. ACCEPTANCE OF AND COMPLIANCE WITH THE ANTI-CORRUPTION POLICY

All the employees of the Farmhispania Group, as well as its business partners, must comply with this Policy.

Non-compliance will be sanctioned in accordance with labour law and other applicable regulations. Therefore, any employees who infringe this Policy will be subject to appropriate disciplinary action, including termination of their contracts and other possible legal actions and/or sanctions.

The consequences of infringement of this Policy will not only affect the offender but also any person who, being aware of such infringement, has allowed it to be committed through act or omission.

7. ADVICE AND REPORTING OF ALLEGED INFRINGEMENT

If you are in doubt about this Policy or if you have any concerns about how to apply it, you should contact your Line Manager, Human Resources Department, Legal Department and/or the Works Council as soon as possible.

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In the event that any person subject to this Policy becomes aware of or has reasonable suspicions of any conduct that could imply an infringement of the law or that are against the provisions in this Policy, he/she must immediately inform his/her Line Manager, who will report it to the Human Resources Department. At such time, a committee will be set up consisting of a member of the Human Resources Department, a member of the Legal Department and a member of the Works Council. This committee will be responsible for conducting the relevant investigations and will adopt the necessary measures to resolve the situation in a fair and transparent manner.



The Farmhispania Group will not tolerate any retaliation against anyone who, in good faith, reports conduct that could imply an infringement of this Policy.

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