

## **COMPLIANCE POLICY**

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## 1.- INTRODUCTION

CORPORACIÓN ALIMENTARIA PEÑASANTA, S.A. (hereinafter CAPSA FOOD), acts with strict respect for current legislation, as well as the uses and good commercial practices applicable anywhere it carries out its activity.

The development of our activities and operations is in accordance with our adherence to the United Nations Global Compact, whose objective is the adoption of universal principles in the fields of human rights, work standards and the environment, as well as the Manifesto for co-responsibility, the main axes of which are focused on sustainable development, the fight against poverty, job insecurity, social and gender equity, respect for cultural diversity, the defense of human and labor rights and the employment of favored groups.

Likewise, we have references of our ethical action in the Universal Declaration of Human Rights of the United Nations and the instruments derived from it, the Tripartite Declaration of the International Labor Organization (ILO) and the Guidelines for Multinational companies of the Organization for the Economic Cooperation and Development (OECD).

To do this, all CAPSA FOOD professionals are committed to knowing and respecting the legal and regulatory standards applicable to the activity carried out in the company, as well as the sector policy, procedures or protocols applicable by CAPSA FOOD, if any.

At CAPSA FOOD we are fully aware of the direct influence of companies on society, the repercussions of their actions and the need, not only to strive to comply with current legislation, but to help improve it as much as possible.

The professionals who form CAPSA FOOD are part of its image and, therefore, we will refrain from carrying out any unethical conduct that could harm the company's reputation, regardless of the consideration of the legality of such conduct.

We are committed to combating the commission of crimes within us by establishing principles that guide the behavior of all our employees and business partners who are related to CAPSA FOOD.

At CAPSA FOOD WE EXPRESSLY PROHIBIT the commission of crimes in any form and any type of non-compliance that could suppose a violation of the current legislation.

For these purposes, the CAPSA FOOD Board of Directors has approved this COMPLIANCE POLICY, having been developed in collaboration with the Compliance Committee, and the necessary resources have been provided for the proper implementation of a CRIMINAL COMPLIANCE MANAGEMENT SYSTEM (CCMS) in the development of our activities.



Our system is intended to prevent, control and manage any possible risk of committing criminal conduct to which the organization is exposed and in its relationship with related persons, business partners and controlled companies.

## **2.- AREA OF APPLICATION**

This COMPLIANCE POLICY applies to CAPSA FOOD, based in Sierra de Granda (Asturias) S/N, Polígono Industrial 0, C.P 33199, in the development of its activities of:

- Manufacture and marketing of dairy products

The scope of application extends to all members of CAPSA FOOD and to the entities that make up its business group at all times, as well as all those contracted, subcontracted, related agents, partners, collaborators and prescribers and other natural and legal persons who act in an authorized manner in the name of or on behalf of our organization.

For the development of this COMPLIANCE POLICY and the CAPSA CRIMINAL COMPLIANCE MANAGEMENT SYSTEM, we have taken into consideration, as a starting point, the requirements established by the UNE 19601: 2017 standard, as well as the provisions of article 31 bis of the Spanish Penal Code.

Our CRIMINAL COMPLIANCE MANAGEMENT SYSTEM designed and implemented, which is subject to periodic evaluations and reviews, has as main COMMITMENTS:

- Establish control plans to deal with the criminal risks to which our organization is subjected when the evaluation carried out periodically yields a result above a low level, with the objective of eliminating, reducing and / or mitigating them.
- Prevent actions or behaviors that violate current legislation or are perceived by our stakeholders as ethically unacceptable.
- Train and sensitize our members, professionals, managers, shareholders, business partners and the like about the criminal risks to which their actions are exposed, as well as about the appropriate response mechanisms established by our organization.

These general commitments are reflected and specified in our PLAN AND MONITORING OF OBJECTIVES which is periodically reviewed and updated, with the approval of the General Management.

## **3.- RISK MANAGEMENT AND COMPLIANCE COMMITTEE**

At CAPSA FOOD we identify and periodically evaluate the criminal risks to which our activities are exposed, documenting the results in our RISK MAP, and establishing risk control plans evaluated above low risk with the clear objective of preventing and reducing their probability of occurrence, as well as to establish monitoring and control mechanisms, providing the system with the necessary resources for its correct execution.



As a product of the internal and external mechanisms for evaluating the effectiveness of our CRIMINAL COMPLIANCE MANAGEMENT SYSTEM, as well as based on the information collected, analyzed and evaluated, we have established measures and are committed to continuously improving the effectiveness of our CCMS, with the aim of creating a true living system capable of adapting to changing market circumstances and to the improvements, opportunities and failures detected.

For the maximum guarantee of authority, competence and independence, a specific position has been designated within our organization chart, called the Compliance Committee, so that, directly reporting to the General Management and with the capacity to report to the Board of Directors, it ensures the correct implementation and improvement of our CRIMINAL COMPLIANCE MANAGEMENT SYSTEM according to the defined and agreed requirements.

The designated Compliance Committee is available to all members of our organization to advise, guide and support them in matters of ethical performance and compliance.

#### **4.- CODE OF ETHICS AND NON-COMPLIANCE**

At CAPSA FOOD we have a current CODE OF ETHICS approved by the Board of Directors.

The provisions contained in the CODE OF ETHICS oblige all administrators, managers and other workers of Corporación Alimentaria Peñasanta SA, or of any of the Group companies, regardless of the contractual modality that determines their employment or commercial relationship, hierarchical position that they hold , responsibilities or geographical area in which they carry out their work.

To sanction conduct contrary to the provisions of this COMPLIANCE POLICY and the CODE OF ETHICS and non-compliance with the remaining requirements of the CRIMINAL COMPLIANCE MANAGEMENT SYSTEM, including criminal conduct, its application is done in an equitable and proportional manner, under the principle of non-discrimination and respecting the applicable labor legislation.

The Collaborator or Third Party that does not comply with any of the determinations that are applicable to them, established in the Code of Ethics or in the Compliance Policies, as the case may be, will be subject to established sanctions, such as disciplinary measures. Collaborators and Third Parties must be aware that the violation of the determinations of this Policy may configure liability in the criminal, civil and administrative fields.

## 5.- COMPLAINT CHANNEL

Any member of our organization, employee, partner, shareholder, director, representative and / or person who acts in an authorized manner in the name of or on behalf of CAPSA FOOD has the obligation to inform and / or report any action, conduct, information or evidence that is susceptible or suspected of violating this COMPLIANCE POLICY, the CODE OF ETHICS or the requirements of the CRIMINAL COMPLIANCE MANAGEMENT SYSTEM of our organization and that may involve a criminal act or conduct.

At CAPSA FOOD we have established the following safe mechanisms to protect, maintain confidentiality and encourage any person to report any type of suspicious act or conduct or to raise any type of question or query in this regard:

- Record of communication through the secure ETHICAL CHANNEL provided by our organization accessible on the website of our company [https://capsafood.intedyacloud.com/canal\\_denuncias/](https://capsafood.intedyacloud.com/canal_denuncias/) and on the employee portal.

Likewise, any question related to queries or doubts regarding compliance, ethics or risks of non-compliance, may be addressed in person or by email to the address [canaletico@capsa.com](mailto:canaletico@capsa.com) addressed to the Coordination of the Compliance Committee of CAPSA.

In order to reinforce the protection of the complainant and / or informant, any communication received through this secure channel will be managed by an external and independent entity of CAPSA. We have secure internal mechanisms and processes to guarantee the confidentiality of the complaints and communications received, as well as to protect from any type of threat or coercion the people who participate in our compliance objective through communication and reporting.

A handwritten signature in blue ink, which appears to be 'JATN', is written over a faint, stylized background graphic that resembles a mountain range or a series of peaks.

José Armando Tellado Nogueira  
Director general CAPSA FOOD

13 de abril de 2020