

# Code of Conduct



October 2022

# Index

Global Engagement .....	1
Principles on which the Code of Conduct is based .....	2
Purpose and values .....	3
Who is it aimed at?.....	4
Principles and rules of conduct .....	5
Ethics and responsibility .....	6
Economic Axis .....	8
Social Axis .....	9
Labour Axis .....	11
Environmental Axis .....	14
How do I know if I am acting ethically & in line with this Code of Conduct .....	16
How to use the Whistleblower Channel .....	17



# Global Engagement

Galletas Gullón S.A. and its subsidiaries (hereinafter "Gullón"), true to its business objective of generating wealth and well-being for society in general and, more specifically, for the Aguilar de Campoo region, adopts a responsible business ethic that allows it to combine the creation of economic value with sustainable development that considers the protection of the environment, social well-being, the development of a favourable framework for labour relations and constant communication with the different stakeholders in order to meet their needs and expectations at all times as its main objectives.

This Code of Conduct has been drawn up taking into account the recommendations of good governance generally recognised in international markets and the principles of social responsibility, as well as the prevention obligations imposed in the field of criminal liability of legal persons.

The Code of Conduct forms part of the system of governance, sustainability and transparency and is fully respectful of the corporate organisation principles set out therein. These include Gullón's commitment to the United Nations Global Compact and its 10 principles as part of Gullón's strategy, culture and daily actions, with the conviction of working in favour of human rights, guaranteeing them throughout the value chain.



My commitment and that of the company is to continue creating value in our land and to satisfy the needs and interests of our stakeholders, aligning our growth with that of the company's environment.

Based on our family culture of closeness and transparency, I subscribe to this Code of Conduct and assume full compliance with its contents, just as I trust that all Gullón's staff and other stakeholders will do so in order to achieve the objectives set as a company.

Lourdes Gullón Rodríguez  
Chair of the Board of Directors



Gullón aspires to ensure that its conduct and that of the people linked to it, in addition to the legislation in force and its system of governance and sustainability, complies with the ethical principles and corporate responsibility defined in this Code of Conduct.

It is an honour for me to place on record my faithful commitment to the values and efforts made by this company to achieve maximum excellence.

Juan Miguel Martínez Gabaldón  
Chief Executive Officer and Managing Director

# Principles on which this Code of Conduct is based

## 1 Principles on human rights and business

Gullón works according to the guiding principles of human rights and business of the United Nations focused on: protect, respect and remedy.

[Guiding Principles on Business and Human Rights.](#)

## 3 Goals of the United Nations Agenda 2030

Gullón works in line with the 17 Sustainable Development Goals. In particular with the objective of promoting a healthy lifestyle, fulfilling its mission to be a global benchmark in healthy biscuits.

[The seventeen goals of Agenda 2030](#)

## 5 Principles and Rights at Work

Gullón is governed by international labour standards aligned with the ILO Declaration on Principles and Rights at Work.

[Principles of the International Labour Organisation](#)

## 7 The Basic Code of the Ethical Trading Initiative

Gullón is aligned with the basic code of the Ethical Trading Initiative (ETI), a leading alliance of companies, trade unions and non-governmental organisations that promotes respect for workers' rights worldwide.

[Basic Code of Ethical Trading](#)

## 9 The EU's Farm to Fork Strategy

Gullón works in line with the European Union Code of Conduct for responsible business and marketing practices in the food sector in the European Union as part of the Farm to Fork Strategy.

[European Union Code of Conduct on Responsible Eating.](#)

## 2 UN Global Compact Principles

Gullón is adhered to the Global Compact and committed to its ten principles in order to comply not only with basic responsibilities to people and the planet, but also to lay the foundations for long-term success.

[The ten principles of the UN Global Compact](#)

## 4 Principles on Inclusion and Diversity

Gullón is a signatory to the 10 Principles on Inclusion and Diversity set out in the Diversity Charter Commitment.

[The ten principles of the Diversity Foundation's Diversity Charter](#)

## 6 Climate neutrality principles of the European Green Pact

Gullón is aligned with the climate objectives of the European Green Pact, working through innovation and excellence for a climate-neutral economy.

[Paris Agreements on Climate Change](#)

## 8 Principles of Corporate Sustainability Due Diligence

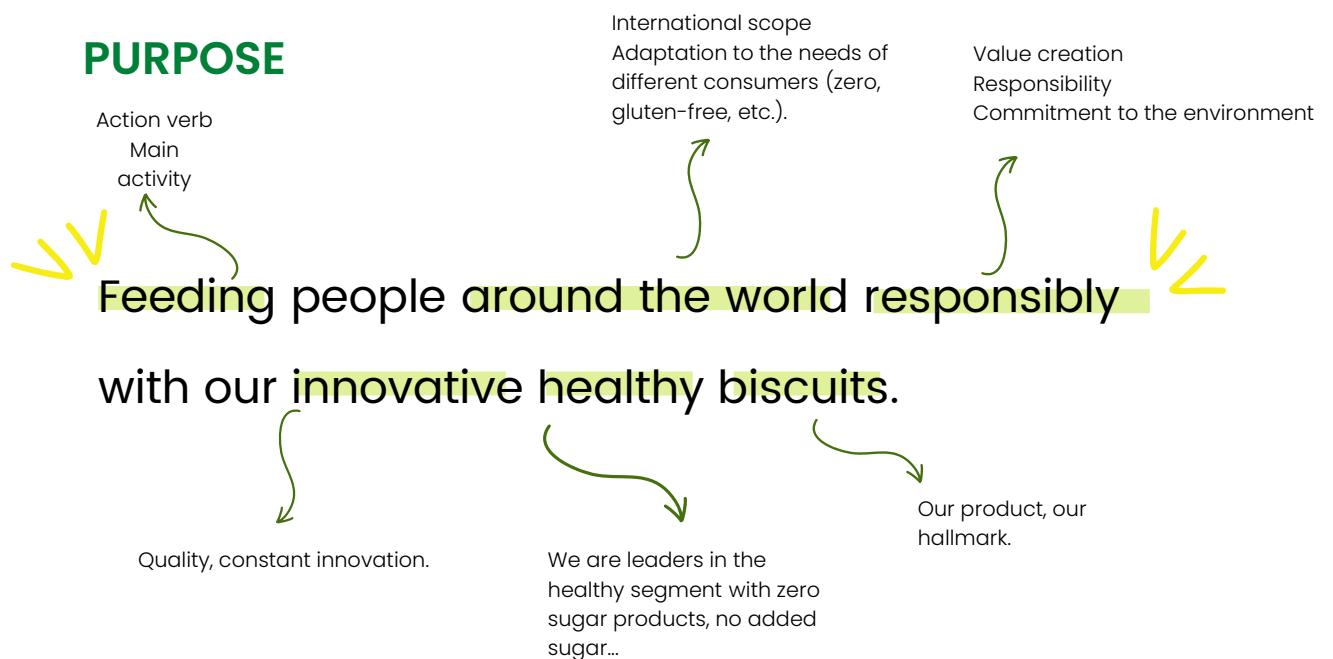
Gullón works according to the principles of Sustainability Due Diligence in its value chain, focusing its efforts on the identification and mitigation of adverse effects on human rights and the environment. Therefore, Gullón integrates sustainability into its management and governance processes in line with the European Green Pact and the Sustainable Development Goals.

[Proposal for a Directive on corporate sustainability due diligence and amending Directive \(EU\) 2019/1937](#)

In addition to the aforementioned principles, Gullón is governed by the following guidelines that guide its actions and go beyond mere compliance with the applicable legal system:

- All operations are carried out in an ethical and responsible manner;
- Any form of corruption within/with the company is eradicated;
- Maximum transparency and credibility is always sought;
- It communicates and shares its commitments with all stakeholders; and
- We ensure the confidentiality and privacy of the information we handle.

## Purpose and values.



## VALUES

- Closeness, transparency and honesty with all stakeholders.
- Commitment to the environment and society.
- Tradition, experience and future: family and innovative vision with the capacity to adapt.
- Respect for people: cooperation and motivation with Gullón's stakeholders.
- Quality, excellence and continuous improvement in products, processes and management model.
- Responsibility for the management of a diverse workforce, through the integration of people with diverse profiles, regardless of: age, race, sex, sexual orientation, gender, religion, ethnicity, nationality, ideology, political affiliation, disability or socioeconomic situation.

## Who is it aimed at?

The Code of Conduct applies to all the companies that make up Gullón and binds all its employees and collaborators, regardless of the position and function they hold.

The application of the Code of Conduct, in whole or in part, may be extended to any natural and/or legal person related to Gullón, when this is appropriate for the fulfilment of its purpose and is possible due to the nature of the relationship.

The reputation and success of the company depends to a large extent on the values that are transmitted to the environment. Every act carried out in relation to Gullón must fully comply with the law and with this Gullón Code of Conduct.

### Co-responsibility

Gullón's principles in terms of ethical and responsible management meet the needs and expectations of the people of the following interest groups:

#### ...As Employees

All Gullón people are responsible for the way in which Gullón carries out its activity and for the impact that the company has in more than 120 countries. Gullón is committed to creating quality employment, improving training, the professional development of employees and the implementation of preventive measures to ensure their health and safety.

#### ...As Suppliers

Gullón adapts its supplier selection processes to criteria of objectivity and impartiality and avoids any conflict of interest or favouritism in their selection. It collaborates with suppliers in improving communication, guarantees compliance with Human Rights and is jointly responsible for environmental management.

#### ...As Consumers

At Gullón we work with the highest quality standards, exhaustive controls are carried out and innovation is sought in order to achieve a healthy and accessible product for society. The company is aware of the importance of precision and transparency in relation to advertising and packaging.

#### ...As Shareholders

Gullón, and thus its shareholders, are committed to the quality, integrity and transparency of their reports, which is reflected in the company's Responsible Taxation Policy that ensures such integrity and transparency. We will apply good governance standards and are committed to working to meet the expectations they have placed in our company.

#### ...As Customers

Gullón is committed to offering all its customers a high standard of excellence, quality, health and safety in its products, and to communicate with them in a clear and transparent manner.

#### ...As Public Administrations

Gullón will never attempt to unduly influence any body or representative of the Public Administration with the aim of producing a favourable result for Gullón. The company will transparently provide the relevant information to the corresponding government bodies in each case.

#### ...As Citizens

Gullón supports initiatives that favour knowledge, improvement and respect for the environment. It works for the socio-economic development and environmental protection of the regions where Gullón carries out its activity.

### ...As media

Our commitment and transparency with communication employees guarantees that the information is complete and coherent, and it will be the Chief Executive Officer - General Manager, or where appropriate the Corporate Director, who provides information to the media.

Persons employed by or linked to Gullón may provide information to the media about the company provided that this has been previously and expressly communicated to and approved by the Corporate Director.

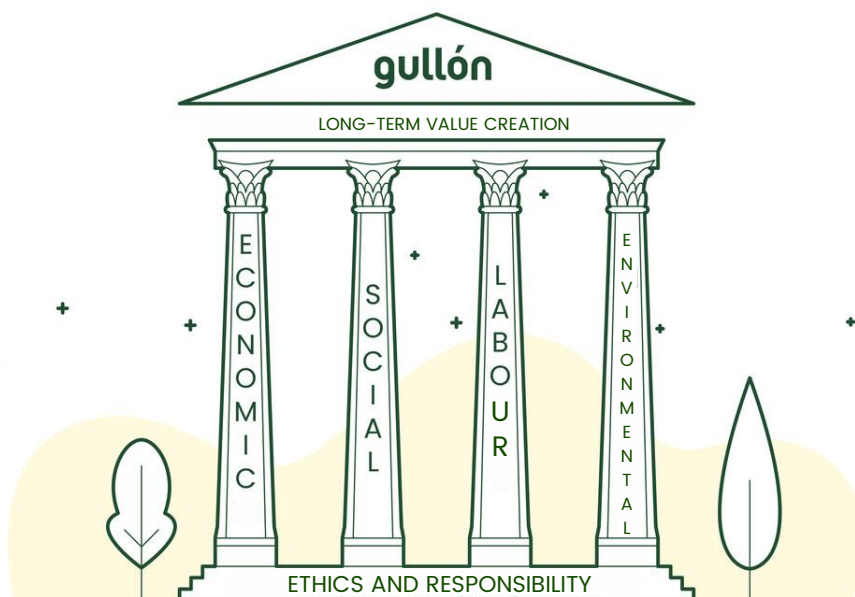
The Code of Conduct will be notified personally to all Directors, members of the Management Committee and other employees of the company. Likewise, the dissemination and obligation to comply with it will be expressly included in employment contracts, a copy will be sent to them and will be included in agreements with suppliers.

The Corporate Department will ensure the correct dissemination of the Code of Conduct.

## Principles and rules of conduct

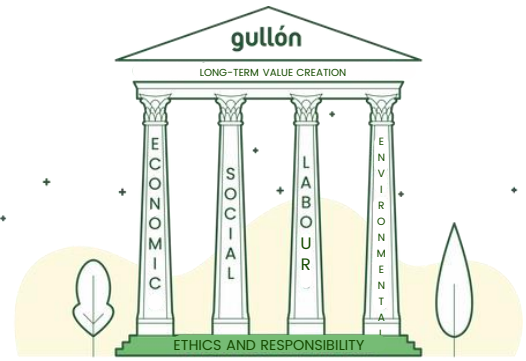
Gullón's commitment as a company, defined in its Responsible Business Master Plan, is based on the ethics and responsibility of all those who are related to the company.

For ethical and responsible development, Gullón has four structural pillars: Economic, Social, Labour and Environmental, which are applicable to all its stakeholders. All this culminates in the creation of long-term value for Gullón and its stakeholders as well as to promote economic and social development in the region of Aguilar de Campoo where the company is located.



## Ethics and responsibility




Gullón's management and action model is based on the commitment of the organisation and all the people who form part of it to act ethically and responsibly in all aspects of the company's day-to-day business. Gullón expresses its firm commitment to the Ethical and Responsible Management Policy, which meets the needs and expectations, as well as the basic standards of behaviour that should govern relations with its stakeholders.



### 1 Anti-corruption

Gullón prohibits bribery (both direct and indirect) and corruption in each and every one of its aspects. To this end, Gullón bases its behaviour on the principles of legality, responsibility and transparency in its relations with third parties, rejecting any form of corruption. In this sense, there is an Anti-Corruption Policy, with the aim of protecting stakeholders and reinforcing trust among them.

This is carried out through the following behaviours:

-  We proceed in accordance with applicable national and international laws, as well as Gullón's policies and procedures.
-  No bribes (both direct and indirect) or kickbacks of any kind or type are offered or accepted.
-  No action is taken that could lead any of Gullón's stakeholders to understand that anything of value is promised or offered to give/do/not do in exchange for obtaining a non-competitive advantage over competitors in Gullón's business or stakeholders.

In this way, Gullón expresses its firm commitment, and demands the same from its stakeholders, to the principles of the Anti-Corruption Policy, against all forms of corruption, including extortion and bribery and, in particular, not to carry out practices that may be considered irregular in its relations with its stakeholders.

### 2 Prevention of Money Laundering and the Financing of Terrorism

Gullón is firmly committed to the prevention of money laundering and the financing of terrorism, and is also firmly committed to collaborating with the competent authorities in this area.

In this regard, the purpose of the Policy for the Prevention of Money Laundering and Terrorist Financing is to establish, in accordance with international standards on the subject, the criteria aimed at preventing Gullón from being used in the execution of any money laundering and/or terrorist financing operation.

Taking into account the activity that Gullón carries out, this Policy has its effects mainly on the prohibition of cash payments and the identification and analysis of suppliers and customers when making payments and collections, both nationally and internationally.

Gullón will carry out appropriate due diligence processes, periodically identifying current and potential impacts in terms of money laundering and terrorist financing and taking appropriate measures to prevent and mitigate non-compliance.



## Ethics and responsibility

### 3 Crime prevention



In this area Gullón bases management on the identification of risks; its prevention, control and communication of the results of it, based on the sufficient information on the class, nature and entity of the illegal acts that could be committed in the scope of the development of Company activities.

Gullón's interest groups have the duty to report through the pertinent channels and made available to them any action or omission that could be interpreted as constituting a crime. Continuing with the aforementioned, Gullón keeps the Door Open with the Corporate Director being at his disposal or by making the communication through the Whistleblower Channel, at the following web address:

<https://canaldenuncias.gullon.es>

How to use the  
Whistleblower Channel



### 4 Compliance



Gullón aligns the Compliance Policy with the values, the culture of integrity and respect for applicable and internal regulations and, consequently, with its determination not to tolerate any conduct within the company that may constitute an action or omission contrary to them. Therefore, the maximum commitment on the part of the members of the Board of Directors, the members of the Management Committee, as well as the rest of the organisation's employees, to comply at all times with its provisions.

Gullón does not permit, authorise or consent in any way or under any circumstances for members of the organisation to carry out acts or operations contrary to this Code of Conduct, or to participate in actions or operations of an unlawful nature, or to seek to obtain a personal benefit (direct or indirect) or to favour any interest that they presume to belong to the organisation.

#### Compliance with the law and the governance and sustainability system

Gullón's stakeholders will strictly comply with current legislation in accordance with the spirit and purpose of the regulations and will observe the provisions of this Code of Conduct, the other regulations and the basic procedures that regulate Gullón's activity. Likewise, they shall fully respect the obligations and commitments assumed by Gullón in its contractual relations with third parties, as well as the uses and good practices of the countries in which they carry out their activity.

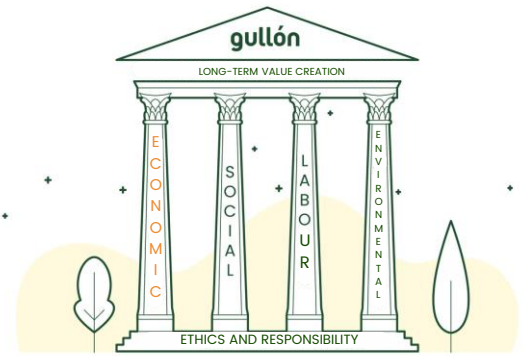
The members of the Management Committee shall be particularly familiar with the laws and regulations, including internal ones, that affect their respective areas of activity and shall ensure that the employees reporting to them receive adequate information and training to enable them to understand and comply with the legal and regulatory obligations applicable to their position.




## Economic

### 5 Fair Competition



Gullón encourages free competition in an honest and loyal manner, achieving competitive advantages through its own performance, know-how and effort.



-  Promote free competition and compliance with the rules in force in this respect;
-  Rejects business practices that limit or impede free competition; and
-  Refrains from carrying out or promoting any action that may be contrary to the applicable regulations in this area.

### 6 Conflicts of Interest



Gullón adapts supplier selection processes to criteria of objectivity and impartiality and avoids any conflict of interest or (non-objective) favouritism in their selection.

Gullón employees undertake to comply with the internal procedures established for the award processes, including, in particular, those referring to the approval of suppliers.

Employees and persons linked to Gullón will avoid any kind of interference or influence from suppliers, customers and/or third parties that may alter their impartiality and professional objectivity and may not receive any kind of remuneration (in cash or in kind) from third parties related to Gullón.

#### Family and friends

Gullón rejects situations in which employees' judgement in decision-making could be badly influenced by family or personal relationships. In such a case, this must be brought to the attention of their hierarchical superior.

### 7 Responsible taxation



In its tax strategy, Gullón shows its commitment to the promotion of responsible taxation, the promotion of prevention and the development of key transparency programmes to foster the trust of the different stakeholders.

In line with the above, Gullón is a signatory to the Code of Good Tax Practices drawn up by the Large Companies Forum in collaboration with the State Tax Administration Agency (Agencia Estatal de Administración Tributaria).

## Economic

### GOOD TAX PRACTICE

- Transparency, Good Faith and Cooperation with the Tax Agency in business tax practice.
- Reconciling responsible compliance with our tax obligations with the commitment to create value for shareholders.
- Commitment to fostering a cooperative relationship with the tax authorities.
- Application of responsible tax policies that enable the prevention of conduct likely to generate significant tax risks.
- Commitment to transparency as a basis for action in the exercise of the tax function.

#### Consequences of non-compliance. - Disciplinary regime.

Failure to comply with this Code of Conduct will entitle Gullón to terminate the commercial or business relationship maintained, regardless of the stakeholder group of which it forms part and/or will entitle it to initiate any possible legal action that may result.

The disciplinary regime for food companies set out in the Arbitration Award of 1996 will be applied.

Gullón will not tolerate any type of breach of the Code of Conduct by any of its stakeholders, regardless of the position of the person committing the breach.

## Social



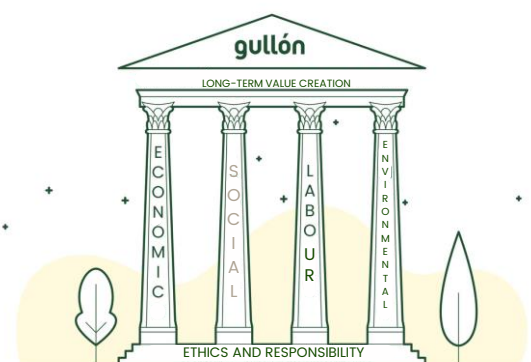
### 8 Data Protection

The legislation applicable to the Code of Conduct is that relating to Organic Law 3/2018, of 5 December, on Personal Data Protection and guaranteeing digital rights.

Gullón guarantees the confidentiality of its stakeholders' data and undertakes not to disclose them under any circumstances, except for contractual purposes, prior written consent or legal obligation.

Gullón collects, stores and uses professional/personal information in line with legal requirements. This information is used only when it is essential.

Gullón manages the data in accordance with the Data Privacy Policy or the Privacy Policy of the Online Complaints Channel, the information security policies and the local data privacy laws in force.



## 9 Transparency of information and responsible advertising

Gullón's primary objective in terms of transparency is to provide clear, truthful and accurate information on its actions. Clarity in the information that must be disclosed is a basic principle that must govern the actions of all the people who make up Gullón, directly or indirectly.

This information transparency is governed by the following Principles of Responsible Advertising:

- The communication channels, both internal and external, developed by Gullón are used to promote trust and dialogue;
- Information is provided in a clear, fluid, open and transparent manner; and
- There are easily accessible channels through which all stakeholders can access them: media, social networks or internal tools.

## 10 Social actions and donations

Gullón contributes, through its business activity and based on its Responsible Business Master Plan, to development at local and provincial level, with measures aimed, among others, at promoting education, equal opportunities, environmental protection, culture, sport, conciliation, diversity and the protection of vulnerable groups, and works to establish firm and permanent links.

Gullón, either on its own or through intermediaries, will refrain from collaborating in initiatives whose purpose does not correspond to the corporate responsibility strategy established by the company.

All contributions of a social, cultural or any other nature made by Gullón through the area to which they are directed (promotion of healthy eating, culture, sport, environmental protection or integration of vulnerable groups, among others), must meet the following requirements: comply with an established corporate purpose, not be anonymous, be formalised in writing, and may be in cash or in kind.

It is strictly forbidden for Gullón, either directly or through intermediaries, to make direct or indirect contributions (regardless of the legal form of such contributions) to trade unions, political parties, including coalitions or groups of voters or civil servants.

### Plan Aguilar, and its link to the region's environment

In 2021, Gullón carried out the Responsible Business Master Plan 2021-2024 in which the main focus was placed on the rural environment in which Gullón operates. This Plan has given rise to five challenges that aim to promote the Aguilar del Campoo region from the following perspectives:

**1 Local employment dynamisers**

**2 Cultural action and promotion**

**3 For a healthier life**

**4 Biodiversity and nature protection**

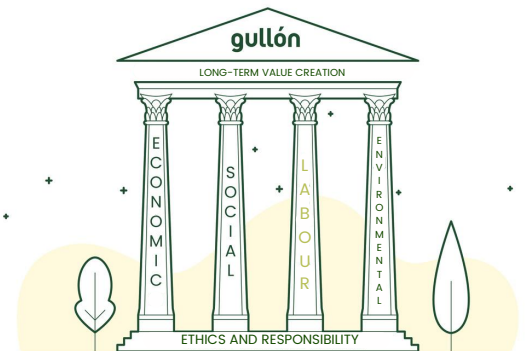
**5 Committed to social inclusion**

# Labour

## 11 Human Rights

Gullón's Human Rights policy demonstrates its commitment to the environment in which it works, people and the planet.

Gullón expects responsible behaviour from all its stakeholders, regardless of the relationship that exists between both parties and will reject any practice or omission that violates human rights, applying the appropriate measures according to the stakeholder group.



## 12 Business opportunities

Gullón does not allow business competition with its employees (directly or indirectly). Nor shall employees take personal advantage of business opportunities presented to them during the course of their employment relationship, unless the General Manager or the Corporate Director of Gullón has previously authorised the execution of the business opportunity in writing.

## 13 Information for internal, confidential and proprietary use

Gullón owns the intellectual property and the rights to use and exploit the brand, computer programmes and systems, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used by its employees, within the framework of their work activity.

It is the responsibility of Gullón and of all its stakeholders to provide sufficient security means and apply the procedures established to protect internal, confidential and reserved information recorded on physical or electronic media against any internal or external risk of non-consensual access, manipulation or destruction, whether intentional or accidental. To this end, Gullón employees shall keep the content of their work confidential in their relations with third parties.

Any reasonable indication of leakage of confidential or reserved information must be reported by those who have knowledge of it to the Corporate Director immediately or through the Whistleblowing Channel.

In the event of termination of the employment or professional relationship, all information for internal, confidential and reserved use will be returned by the employee to Gullón, including documents and storage media or devices, as well as information stored on any corporate or personal electronic device, with the employee's commitment to confidentiality subsisting in all cases.

## Labour

### 14 Gifts and presents



Gullón does not accept to give or receive gifts, presents, payments or other benefits from any of its stakeholders.

As a general rule, gifts and incentives must not be accepted from stakeholders and it is forbidden to give, promise or offer, directly or indirectly, any asset of value to any natural or legal person, in order to obtain undue advantages. Assets of value are understood to be money: cash or cash equivalents (cheques, gift cheques, discounts, cryptocurrencies, shares, marketable securities, etc.), loans, gifts or presents of any value (except those defined as institutional gifts by Corporate Management).

Gullón's policy is clear: none of the following stakeholders: employees, members of the Board of Directors and other persons acting on behalf of Gullón, may pay, receive bribes or attempt to unduly influence any other person whether in the public or private sector, even if such payment is requested and its status as a bribe is denied.



### RIGHT TO PRIVACY

Gullón respects the right to privacy of its stakeholders, in all its manifestations, and especially with regard to their personal and economic data.

Gullón's stakeholders undertake to make responsible use of the computer systems and, in general, of any means that Gullón makes available to them in accordance with the policies and criteria established for this purpose.

Gullón undertakes not to disclose personal data of its stakeholders except in cases of legal obligation.

### How we work for the employee



No person employed at Gullón will be subject to discrimination on the grounds of age, race, sex, sexual orientation, gender, religion, ethnicity, nationality, ideology, political affiliation, disability or socioeconomic status, thus supporting and complying with Principle 6 of the United Nations Global Compact and the provisions of Law 15/2022, of 12 July, comprehensive for equal treatment and non-discrimination.

Gullón offers its employees a safe working environment. All possible mechanisms are established to avoid accidents, injuries and occupational illnesses associated with professional activity through strict compliance with all regulations, training and preventive management of occupational risks.

Gullón will support good internal relations between employees, favouring a respectful working environment that is committed to people.

## Laboral



### SELECTION

Gullón will carry out the selection and recruitment processes openly so that the greatest number of suitably qualified people can access them. Similarly, Gullón will maintain the most rigorous and objective selection process, based on criteria determined by the area responsible according to the needs at any given time and the position to be filled.

The direct relatives or partners of employees who so wish may apply for employment at Gullón and will be included in the ordinary selection process for hiring personnel at Gullón, assessing qualifications, performance, skills and experience, as long as they have no other business relationship with the company.

The children of employees will have preference when it comes to carrying out internships within the company and will be eligible to obtain scholarships during their academic stage.



### TRAINING

Gullón will promote the training of its employees. The training programmes will promote equal opportunities and the personal and professional development of the team, thus contributing to the achievement of Gullón's objectives.

Gullón employees undertake to permanently update their technical and management knowledge and to take advantage of the training programmes made available to them by Gullón.



### HEALTH AND SAFETY AT WORK

Gullón, as a safe and healthy company, will promote an occupational health and safety programme and will adopt the preventive measures established in this respect in current legislation and any others that may be established in the future.

Gullón employees will observe and comply with special attention to the rules relating to health and safety at work, with the aim of preventing and minimising occupational hazards.



### EQUALITY

Gullón will not establish salary differences based on personal, physical or social conditions such as: age, race, sex, sexual orientation, gender, religion, ethnicity, nationality, ideology, political affiliation, disability or socioeconomic status.

Gullón prohibits any form of physical, sexual, psychological or verbal harassment or abuse of its employees, as well as any other conduct that could generate an intimidating, offensive or hostile working environment, as reflected in its Equality Plan, its Sexual Harassment Protocol or its Workplace Harassment Protocol.

Gullón offers its employees the possibility of reporting a situation that harms the well-being of a person linked to the company through the Whistleblower Channel or to the Corporate Director.

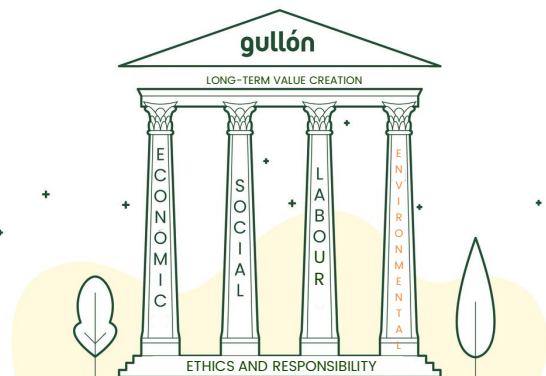
## 15 Resources for the development of professional activity

Gullón assumes that its employees undertake to make responsible use of the resources and means placed at their disposal, using them exclusively for activities employed in the interests of Gullón and not for private purposes. Gullón employees will avoid any practices, especially superfluous activities and expenses, that diminish the creation of value for stakeholders.

## Environmental

### 16 Protecting the environment and combating climate change

Gullón carries out its activity with respect for and protection of the environment, complying with and/or improving the standards established in the applicable environmental regulations, minimising the impact that its activities may have on the environment and promoting actions that contribute to its protection, carrying out and sponsoring research projects, as well as promoting employee awareness.



Gullón works daily to establish sustainable and environmentally friendly guidelines, through waste management objectives, innovation in its packaging, the measurement, reduction and compensation of its carbon footprint, and the respect and preservation of the environment in which it is located, among other actions.

### 17 Decarbonisation

One of Gullón's main objectives is to advance towards a decarbonisation plan, in which the contents to be included and the link or contribution of energy efficiency to decarbonisation are being studied. One of the main guiding elements for achieving climate objectives will be the development of long-term Climate Action Plans in line with the objectives of the Paris Agreement and the United Nations Sustainable Development Goals (SDGs). Likewise, the decarbonisation roadmap proposed by Spain and Europe is analysed in order to advance along the proposed line.

To this end, Gullón has a working group and all the possibilities are assessed with regard to the use of renewable energy sources or initiatives to reduce emissions that will allow us to be carbon neutral in the coming years, prioritising this line over compensation.





## 18 Cage-free hens

---

Gullón has made a commitment to stop using eggs from caged hens by 2025. This is an objective on which work is being carried out progressively and which affects all the uses of eggs in the company. That is, shell eggs, liquid eggs and egg products.

## 19 Circular Economy

---

Gullón seeks more sustainable production models and the mitigation of the adverse impacts that the activity may have on climate change, making the circular economy be understood as an opportunity to promote sustainability from its three essential aspects: social, environmental and economic.

Gullón's approach in this area is aimed at combating food waste, reducing the use of plastic and the search for a zero waste production model.

Gullón has a Circular Economy working group that shares and evaluates new initiatives and improvements that allow it to grow as a committed company.

To find out more about what Gullón does in circular economy you can read the annual corporate report

[Read report](#)



## 20 Food Waste

---

Gullón has a production model that makes the most of our resources and raw materials.

In addition, the little waste generated during the value chain is reused to become by-products for animal feed or cosmetics, among others.

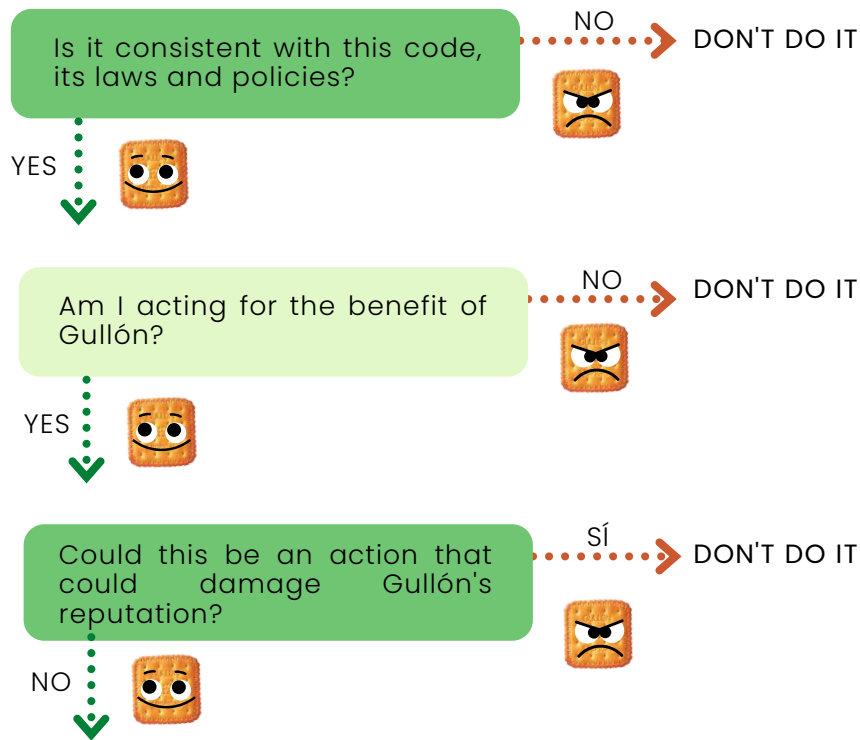
The food waste generated in Gullón is less than 1% of everything it produces.

Bearing in mind Gullón's large production capacity, the development of a Food Waste Prevention Plan has been set in motion, which brings to the table very important aspects such as awareness and sensitisation of stakeholders, considering that, as well as belonging to the production part, we are all consumers and generate this household waste.

Gullón's responsibility is to raise awareness in its environment, so it is working along the lines set out in the Aguilar Plan to generate an impact that generates a new way of consuming and making the most of.

As far as the finished product is concerned, there are measures to avoid the waste of surpluses. One of these measures, which also reinforces the social commitment, is the donation of products to non-profit organisations.

## How do I know if I am acting ethically & in line with this Code of Conduct



If, once these questions have been asked, the impact of such an action/omission is not clear, appropriate channels should be used to clarify before a decision is taken.

These channels are:



Internally in the company:  
Direct contact with Gullón's Corporate Director.



Internally, which can be anonymous or not, and external to the company:  
Through the Whistleblowing Channel explained below.

[Click here to access the Whistleblowing Channel](#)



## How to use the Whistleblower Channel

Gullón makes available to all stakeholders a channel that allows them to report, using a simple form, potentially irregular activities and conduct that involve or may involve the commission of a criminal offence or contrary to this document.

This channel, <https://canaldenuncias.gullon.es>, is also accessible from the corporate website, [www.gullon.es](http://www.gullon.es) in the menu section About Us ---> Whistleblower Channel.

The communications made through this channel must always comply with criteria of truthfulness and proportionality, and may not be used for purposes other than those that pursue compliance with current legislation.

The employee who reports an irregular action may decide whether or not to identify him/herself. In the event that he/she identifies him/herself, it will be considered confidential information and, therefore, will not be communicated to the person reported without his/her consent, thus guaranteeing the confidentiality of the identity of the whistleblower and avoiding any type of response to the whistleblower by the person reported as a result of the report.

Gullón undertakes not to adopt any form of reprisal, directly or indirectly, against stakeholders who have reported through the Whistleblowing Channel any conduct that, in accordance with the provisions of this Code of Conduct and current legislation, should be reported, unless they have acted in bad faith. In this regard, we have a Whistleblowing Channel Management Policy that provides for the foresight and protection of the rights and guarantees of all parties involved in the whistleblowing process and subsequent investigation.

Without prejudice to the foregoing, the data of the persons making the report may be provided both to the judicial authorities, if required by such authorities as a result of any proceedings arising from the subject matter of the report, and to the persons involved in any subsequent investigation or judicial proceedings initiated as a result of the investigation. Said communication of data to the judicial authorities will always be carried out in full compliance with the legislation on personal data protection.

Gullón's communication with its stakeholders is inspired by respect for the right to information, transparency and under no circumstances falsehood or deception. To this end, the tools provided for this purpose and which are considered most appropriate at any given time will be used.

Access to the Code of Conduct is open, as it is available to anyone who wishes to know it through <https://gullon.es/responsabilidad-corporativa/>.



Gullón is a family biscuit company with a history of more than 130 years. Their work for excellence has led them to be a benchmark in healthy biscuits that has crossed the border to 120 countries on all continents.

Title: Code of Conduct.

Edition: Galletas Gullón S.A.

Telephone: +34 979 12 21 00

Contact for questions or clarifications: [Whistleblower channel](#)

Web page: [www.gullon.es](http://www.gullon.es)

Coordination: Corporate Department.

© of the Edition: October 2022, Ctra. de Burgos km 1,5 34800, Aguilar de Campoo, Palencia. Galletas Gullón S.A. and its subsidiaries.

No part of this document may be reproduced in any form without the prior approval of the Corporate Department.

