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Aguilar de Campoo, January 1, 2025

1. PURPOSE

Galletas Gullón, S.A. and its subsidiaries (hereinafter “**Galletas Gullón**”) shows its firm commitment to the strict compliance with the regulations on prevention and fight against corruption, developing the principles contained in our Code of Conduct and extending its compliance to all persons who work or collaborate with Galletas Gullón.

Galletas Gullón, through the Code of Conduct, establishes that all employees, and people who collaborate with the same, must be governed by ethical, responsible and transparent behaviour, taking action and making decisions before any act of corruption or bribery by employees and third parties acting on behalf of Galletas Gullón.

Galletas Gullón, as a member of the United Nations Global Compact, publicly expresses its support and respect for the fundamental principles against this bad practice included in the United Nations Convention against Corruption, as well as the use of the Global Compact Report Guide based on Principle 10 on the fight against corruption, committing to work against it in all its forms, including extortion or investigation of the same, bribery, conflict of interest, influence peddling, documentary falsification, money laundering, use of privileged information and fraud or any product of the above-mentioned practices.

This Policy is developed and supplemented through the other Galletas Gullón policies/procedures and the Code of Conduct.

2. SCOPE

This Policy applies to all companies of Galletas Gullón.

3.- COMMITMENT

Galletas Gullón has a clear policy: no employee, member of the Management Committee, member of the Board of Directors and other persons acting on behalf of Galletas Gullón may pay, offer or receive bribes or attempt to improperly influence in any way any other person, - whether in the private or public sector - even if said payment is requested and its status as a bribe is denied.

We reject any form of corruption by applying a zero tolerance criterion for any breach of this Policy.

In order to prevent corruption¹, Galletas Gullón will carry out all its activities in accordance with the legislation in force in all its activities and in all the countries in which it operates, according to its spirit and purpose, and committing the company to:

- Not to influence the will or objectivity of third parties to obtain any benefit or advantage through the use of unethical practices and/or contrary to the applicable law.
- Not to give, promise, or offer, directly or indirectly, any valuable assets to any natural or legal person, for the purpose of obtaining undue advantages.

¹ Corruption: offering, promising, granting, receiving, requesting, or accepting an unjustified benefit, for itself or a third party, to unduly favour another person in the acquisition or sale of products, in the procurement of services or in commercial relations.

² Valuable assets: cash or cash equivalent (checks, gift vouchers, discounts, cryptocurrencies, stock, tradable securities, etc.), loans, gifts or presents of any value.

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- Not to receive, directly or indirectly, any valuable asset from any natural or legal person, in order to be granted undue advantages from Galletas Gullón.
- Do not allow any facilitation payment.
- Not to finance or otherwise support, directly or indirectly, any political party, its representatives or candidates.
- Do not use donations to cover up improper payments.
- Not to request or receive unduly, directly or indirectly, commissions, payments or benefits from third parties on the occasion of or because of an investment, divestment, financing or expenditure operations carried out by Galletas Gullón.
- To faithfully and accurately reflect all our actions, operations and transactions in the books and records.
- Promote internal training in the prevention and fight against corruption.

Any person who has a relationship with Galletas Gullón and has evidence, doubts or suspicions of any form of corruption, has the right and obligation to file a complaint, through the Whistleblowing Channel, in a nominative or completely anonymous manner in accordance with the principles and guarantees established by law, on corruption cases of which she/he is aware. <https://canaldenuncias.gullon.es/>. Said Whistleblowing Channel provides an easy, anonymous and confidential way.

Employees who violate these provisions will be subject to the appropriate disciplinary measures, including the termination of the contractual relationship, as well as possible legal actions and/or penalties. Galletas Gullón reserves the right to adopt the measures it deems and considers appropriate regarding the rest of the interest groups.

This Policy has been reviewed and approved by the CEO on behalf of the Board of Directors of Galletas Gullón on January 1st, 2025.

Juan Miguel Martínez Gabaldón
CEO and General Director