

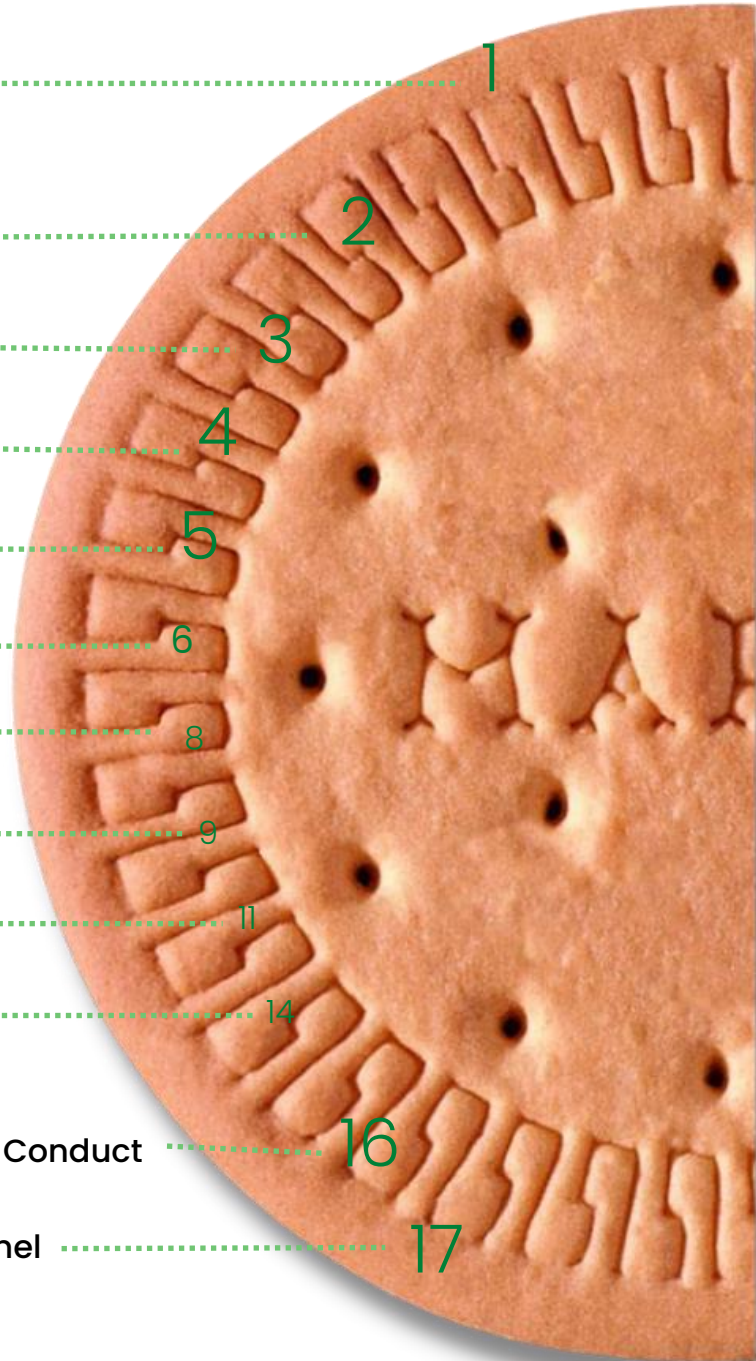
# Code of Conduct



January 2025

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# Global Commitment

Galletas Gullón S.A. and its subsidiaries (hereinafter "Galletas Gullón"), true to its corporate purpose of generating wealth and well-being for society in general and, more specifically, for the Region where we carry out our activity, adopts a responsible business ethic that allows to combine the creation of economic value with sustainable development which considers as **main objectives** the protection of the environment, social welfare, the development of a favourable labour relations framework and the constant communication with the different stakeholders in order to meet their needs at all times.

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

The Code of Conduct is part of the governance, sustainability and transparency system and is fully respectful of the corporate company principles established in the same. These include Galletas Gullón's commitment to the United Nations Global Compact and its 10 principles as part of the strategy, culture and daily actions of Galletas Gullón, with the conviction of working for human rights by guaranteeing them throughout the value chain.



My commitment and that of the company is to continue creating value in our land and 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 endorse this Code of Conduct and undertake to comply fully with its contents, as well as trust that all the staff and other stakeholders of Galletas Gullón shall do so to achieve the objectives established as a company.

Lourdes Gullón Rodríguez  
Chairman of the Board



Galletas Gullón aims to ensure that its conduct and that of the persons related to the same, comply and conform, in addition to the legislation in force and its governance and sustainability system, to the ethics and corporate responsibility principles defined in this Code of Conduct.

It is an honour for me to place on record my faithful commitment to the values and efforts of this company to achieve the highest standards of excellence.

Juan Miguel Martínez Gabaldón  
CEO and General Director

# Principles on which this Code of Conduct is based

## 1 Principles on human rights and business

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

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

## 3 The 2030 Agenda of the United Nations Objectives

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

[The seventeen objectives of the 2030 Agenda](#)

## 5 Principles and Rights at work

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

[International Labour Organization Principles](#)

## 7 The Basic Code of the Ethical Trade Initiative

Galletas Gullón is aligned with the basic code of the Ethical Trading Initiative (ETI), a leading alliance of businesses, unions and non-governmental organizations that promote respect for employees' rights around the world.

[Ethical Trading Initiative Base Code](#)

## 9 European Union "Farm to Fork" Strategy

Galletas Gullón works in line with the European Union Code of Conduct for Responsible Business and Marketing Practices in the Food sector within the Farm to Fork Strategy framework.

[European Union Code of Conduct for Responsible Food Business and Marketing Practices](#)

## 2 Principles of United Nations Global Compact

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

[The Ten Principles of the United Nations Global Compact](#)

## 4 Principles on Inclusion and Diversity

Galletas Gullón is a signatory of the 10 Inclusion and Diversity Principles embodied in the commitment of the Diversity Charter.

[The Ten Principles of the Diversity Charter of the Diversity Foundation](#)

## 6 Climate neutrality principles of the European Green Deal

Galletas Gullón is aligned with the climate objectives of the European Green Deal working from innovation and excellence for a climate neutral economy.

[Paris Agreements on Climate Change](#)

## 8 Sustainability Due Diligence Principles

Galletas Gullón is committed to the Sustainability Due Diligence principles in its value chain focusing its efforts on identifying and mitigating adverse effects on human rights and the environment. Galletas Gullón also integrates sustainability into its management and governance processes in line with the European Green Deal and the Sustainable Development Goals.

[Directive \(EU\) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on sustainability business due diligence and amending Directive \(EU\) 2019/1937 and Regulation \(EU\) 2023/2859](#)

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

- All operations are carried out under an ethical and responsible manner;
- Any form of corruption is eradicated within/with the company;
- Maximum transparency and credibility are always sought;
- All stakeholders are communicated and made aware of its commitments; and
- The confidentiality and privacy of the information we handle is ensured.

## Purpose and values



## VALUES

- Closeness, transparency and honesty with all stakeholders.
- Commitment to the environmental and social environment.
- Tradition, experience and future: family and innovative vision with adaptive capacity.
- Respect for people: cooperation and motivation with Galletas Gullón 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 their ideology, political or union affiliation, religion or belief, age, marital status, ethnicity, race, nationality, sex, sexual orientation or identity, gender, socioeconomic status, illness or disability.

## To whom is it addressed?

The Code of Conduct applies to Galletas Gullón, S.A. and its subsidiaries and binds all its employees and collaborators, regardless of their position and function.

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

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

### Co-responsibility

Galletas Gullón principles regarding ethical and responsible management meet the stakeholders' needs and expectations:

#### ...As employees

All the people at Galletas Gullón are responsible for the way Galletas Gullón carries out its activity and the impact the company has in more than 120 countries. Galletas Gullón is committed to the creation of quality employment, improve training, professional development of the workforce and the implementation of preventive measures to ensure their safety and health.

#### ...As suppliers

Galletas Gullón adapts the supplier selection processes to objectivity and impartiality criteria and avoids any conflict of interest or favouritism in the selection of suppliers. It collaborates with suppliers to improve communication, ensure Human Rights compliance and be co-responsible in environmental management.

#### ...As consumers

Galletas Gullón works with the highest quality standards, carries out exhaustive controls and seeks innovation to reach a healthy and accessible product for society.

The company is aware of the importance of accuracy and transparency regarding advertising and packaging.

#### ...As shareholders

Galletas Gullón, and its shareholders, are committed to the quality, integrity and transparency of its reports, this is reflected in the company's Responsible Tax Policy, which ensures said integrity and transparency. We shall apply the good governance principles and we undertake to work to meet the expectations they have placed in our company.

#### ...As customers

Galletas Gullón is committed to offer to 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 way.

#### ...As Public Bodies

Galletas Gullón shall never attempt to unduly influence any agency or representative of the Public Body in order to produce a favourable result for Gullón. The Company shall provide the relevant information in a transparent manner to the relevant government bodies in each case.

#### ...As citizens

Galletas Gullón supports initiatives that promote knowledge, improvement and respect for the environment. Galletas Gullón works for the socioeconomic development and the protection of the environment in the regions where it carries out its activity.

### ...As means of communication

Our commitment and transparency with the people who work in the media guarantees that information is complete and coherent, and Corporate Management is authorised to maintain the relationship with the media.

Workers or persons with any type of relationship with Galletas Gullón may provide information to the media about the company provided that it has been expressly communicated and approved in advance by the Corporate Management.

The Code of Conduct shall be notified personally to all its Directors, members of the Management Committee as well as to all employees of Galletas Gullón. Furthermore, the dissemination and obligation to comply shall be expressly stated in employment contracts and incorporated in agreements with suppliers.

The company shall ensure the correct dissemination of the Code of Conduct.

## Principles and codes of conduct

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

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






# Ethics and responsibility

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



## 1 Anti-corruption

Galletas Gullón prohibits bribery (both direct and indirect) and corruption in each and every aspect. To do this, Galletas Gullón bases its behaviour on the legality, responsibility and transparency principles to carry out its relations with third parties, rejecting any form of corruption. In this regard, there is an **Anti-Corruption Policy**, in order to protect the stakeholders and strengthen trust among them. This is done through the following behaviours:

-  We proceed in accordance with applicable national and international legislation, as well as Galletas Gullón's policies and procedures.
-  No bribes (direct or indirect) or illegal commissions of any type or kind are offered or accepted.
-  No action is taken that could lead any of Galletas Gullón's stakeholders to understand that it promises or offers to give/make/do anything of value in exchange for obtaining a non-competitive advantage over competitors in Galletas Gullón's business or stakeholders.

Thus, Galletas Gullón expresses its firm commitment, and requires the same from its stakeholders, regarding the Anti-Corruption Policy principles, against all its forms, including extortion and bribery and, in particular, to carry out practices that may be considered irregular in their relations with its stakeholders.

## 2 Conflict of interest

Galletas Gullón states its commitment to the provisions of the Conflict of Interest Management Policy, and requires the same of its stakeholders, so that Galletas Gullón, the members of the governing body and their employees cannot be compromised as a result of conflict of interests with the stakeholders, personal interests and those of the company itself, in a manner in which said situation would compromise their ability to perform their functions independently and objectively, and therefore, adapts the supplier selection processes with objectivity and impartiality criteria and avoids any conflict of interest or (non-objective) favouritism in the selection of suppliers.

Galletas 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 associated to Galletas Gullón shall avoid any kind of interference or influence from suppliers, clients, and/or third parties that may alter their impartiality and professional objectivity and may not receive any kind of remuneration (cash or in kind), benefit or advantage from third parties that have a relationship with Galletas Gullón.



# Ethics and responsibility

## Family and friends

Galletas Gullón rejects situations in which the judgement in decision-making of employees could be influenced by family or personal relationships. In said case, the same must be reported to the direct superiors.

## 3 Criminal prevention

Galletas Gullón bases the management of this area on the identification of risks; their prevention, control and communication of the results of the same, based on sufficient information to know the kind, nature and entity of the offences that could be committed in carrying out the activities of the company. Galletas Gullón's stakeholders have the duty to report through the relevant channels available to them any action or omission that could be interpreted as a criminal offence, as established in the Whistleblowing Channel corresponding section.

## 4 Compliance

Galletas Gullón aligns the Compliance Policy with the values, the integrity and respect culture of the applicable internal regulations and, consequently, with its determination not to tolerate any conduct within the same that may constitute an act or omission contrary to the same. Therefore, the members of the Board of Directors, the members of the Management Committee, as well as the rest of Galletas Gullón's employees, must be fully committed to comply at all times with its provisions.

The members of the Management Committee shall be particularly familiar with the laws and regulations, including internal regulations, that affect their respective areas of activity and shall ensure that the persons 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.

Galletas Gullón does not allow, authorize, or consent in any manner or under any circumstances that the members of the company carry out acts or operations contrary to this Code of Conduct, or that they participate in acts or operations of an illicit nature, nor that it is intended to obtain a personal benefit (direct or indirect) or to further any interests that they presume the company to have.

## 5 Gifts and presents

As a general rule, Galletas Gullón does not accept gifts and incentives from stakeholders and it is prohibited to give, promise or offer, directly or indirectly, any valuable asset to any natural or legal person, in order to obtain undue advantages. Understanding valuable assets: cash or cash equivalent (checks, gift vouchers, discounts, cryptocurrencies, stock, tradable securities, etc.), loans, gifts or presents of any value.

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



## RIGHT TO PRIVACY

Galletas Gullón respects the right to privacy, the personal and economic data of its stakeholders in all its aspects and especially of the employees of Galletas Gullón.

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

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




## Economic

### 6 Fair Competition



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

This implies that:

-  Free competition and compliance with existing rules is encouraged;
-  Business practices that limit or impede free competition are rejected; and
-  Refrain from carrying out or promoting any act that may be contrary to the applicable regulations in this matter.



### 7 Prevention of Money Laundering and Financing Terrorism



Galletas Gullón shows its firm commitment to the prevention of money laundering and financing terrorism, and also expresses its firm willingness to cooperate with the relevant authorities.

In this regard, the Prevention of Money Laundering and Financing Terrorism Policy is committed to comply and enforce the applicable laws at all times and places, and to maintain due diligence regarding the prevention, detection and reporting any conduct, irregular action or mere attempt on this matter.

Taking into account the activity that Galletas Gullón carries out, this Policy mainly focuses on the identification and analysis of suppliers and customers when making payments and collections, both national and international, with special attention to those collections and payments that could have their origin or destination in tax havens or in countries that could be included in black lists.

## Economic

### 8 Responsible taxation



Galletas Gullón states its commitment to the provisions of the Responsible Taxation Policy and demands the same of its stakeholders.

Galletas Gullón in its tax strategy is committed to promote responsible taxation, promoting prevention and developing key transparency programmes to build trust among different stakeholders.

#### GOOD TAX PRACTICES

- Transparency, Good Faith and Cooperation with the Tax Agency in corporate tax practice.
- Reconciling responsible compliance with our tax obligations with a commitment to create value for shareholders.
- Commitment to promote a cooperative relationship with tax administrations.
- Implementation of responsible tax policies that allow the prevention of behaviours that may generate significant tax risks.
- Commitment to transparency as a basis for action in tax function.

#### Non-compliance consequences - Disciplinary regime -

Failure to comply with this Code of Conduct shall empower Galletas Gullón to end the commercial or business relationship maintained regardless of the interest group of which it is part and/or shall entitle the initiation of possible legal actions that may result.

The disciplinary regime of food companies established in the 1996 Arbitration Award shall apply to all employees.

Galletas Gullón shall not tolerate any breach of the Code of Conduct by any of its stakeholders, regardless of the position of the person who commits the non-compliance.

## Social



### 9 Data Protection

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

Galletas Gullón guarantees the confidentiality of the data of its stakeholders and agrees not to disclose it in any case, except for contractual purposes, prior written consent or by legal obligation.

Galletas Gullón collects, stores and uses professional/personal information according to legal requirements. Said information is used only when it is essential.

Galletas Gullón manages the data in accordance with the **Data Protection and Privacy Policy** or the **Whistleblowing Channel Privacy Policy**, the information security policies and the local data privacy laws in force.



## 10 Information transparency and responsible advertising

Galletas Gullón has as its primary objective regarding transparency to provide clear, truthful and accurate information on its activities. Clarity in the information that must be disclosed is a basic principle that should govern the conduct of all the people who make up Galletas Gullón, directly or indirectly.

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

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

## 11 Social content activities and donations

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

Galletas Gullón, by itself, or through intermediaries, shall refrain from collaborating in initiatives whose object does not correspond to the corporate responsibility strategy established by the same.

All contributions of social, cultural or any other nature made by Galletas Gullón through the area to which they are directed (promotion of healthy food, culture, sports, protection of the environment or insertion of vulnerable groups, among others), must comply with the following requirements: fulfil an established corporate purpose, not be anonymous, to be made in writing, and may be in cash or in kind.

It is strictly forbidden for Galletas Gullón, by itself or through intermediaries, to make, directly or indirectly, contributions (regardless of the legal form of said contributions) nor to unions, political parties, including coalitions or groups of voters or public officials.

### Plan Aguilar and its link to the environment of the region

Galletas Gullón through its Responsible Business Director Plan places its main focus in the rural environment where the company is located. From this Plan, five challenges have been born aimed at promoting the Aguilar de Campoo region from the following perspectives:

1 **Creation of local employment**

2 **Cultural and promotion activities**

3 **For a healthier life**

4 **Biodiversity and environment protection**

5 **Committed to social inclusion**

# Labour

## 12 Human Rights



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

Galletas Gullón expects responsible behaviour from all its stakeholders, regardless of the relationship between both parties and shall reject any practice, omission or a violation of human rights, applying the appropriate measures according to the interest group.



## 13 Business opportunities



Galletas Gullón does not allow to maintain business competition with its employees (directly or indirectly). Employees shall also not take personal advantage of the commercial opportunities presented to them during the course of their employment relationship, unless Galletas Gullón has previously authorized the execution of the business opportunity in writing.

## 14 Information for internal use, confidential and proprietary



Galletas Gullón owns the intellectual property and the rights of use and exploitation of the trademark, software and computer systems, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used by its employees, in the framework of their work activity.

It is the responsibility of Galletas Gullón and all its stakeholders to have adequate security means and apply the established procedures to protect the internal, confidential and registered proprietary information on a physical or electronic medium, against any internal or external risk of unauthorised access, manipulation or destruction, both intentional and accidental. For these purposes, Galletas Gullón employees shall keep confidentiality about the content of their work in their relations with third parties.

Any reasonable indication of confidential or proprietary information leakage must be reported by those with immediate knowledge directly or through the Whistleblowing Channel.

In the event of termination of the employment or professional relationship, all internal corporate, confidential and proprietary information shall be returned by the employee to Galletas Gullón, including documents and storage media or devices, as well as the information stored in any corporate or personal electronic device, subsisting in any case the confidentiality commitment of the employee.

# Labour

## How we work for the working person



No worker at Galletas Gullón shall be subject to discrimination based on age, race, sex, sexual orientation, gender, religion, ethnicity, nationality, ideology, political affiliation, disability or socio-economic status, thus supporting and complying with Principle 6 of the United Nations Global Compact and the provisions of Law 15/2022, of 12 July, for equal treatment and non-discrimination and Royal Decree 1026/2024, of 8 October, which develops the Law on equality and non-discrimination of LGTBQ persons in companies.

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

Galletas Gullón will support good internal relations between employees, favouring a respectful, inclusive and committed working environment.



### SELECTION

Galletas Gullón shall carry out the selection and recruitment processes openly so that it can be accessed by the greatest number of people with the appropriate qualifications. Similarly, Galletas Gullón shall maintain the most rigorous and objective selection process, taking into account criteria determined by the responsible area according to the needs of each moment and the position to be filled.

Direct family members or partners of employees who wish to do so may apply for employment at Galletas Gullón and will be included in the ordinary selection process for the recruitment of staff at Galletas Gullón, assessing qualifications, performance, skills and experience, provided that they do not have any other business relationship with the company.

Employees' children shall have preference when it comes to acquire work experience within the company.. The definition of related parties is found in the Conflict of Interest Management Policy duly published on the web.



### TRAINING

Galletas Gullón shall promote the training of its staff. The training programmes shall promote equal opportunities and the personal and professional development of the team, thus contributing to the achievement of the objectives of Galletas Gullón.

Galletas Gullón employees are committed to constantly update their technical and management knowledge and taking advantage of the training programmes made available to them by the company.

## Labour



### HEALTH AND SAFETY AT WORK

Galletas Gullón, as a safe and healthy company, shall promote a safety and health at work programme and shall adopt the preventive measures established in this regard in the current legislation and any other that may be established in the future.

Galletas Gullón employees shall follow and comply with the regulations related to safety and health at work, in order to prevent and minimize occupational risks.



### EQUALITY

Galletas Gullón shall not establish wage differences based on personal, physical or social conditions such as: ideology, political or union affiliation, religion or belief, age, marital status, ethnicity, race, nationality, sex, sexual orientation or identity, gender, socioeconomic status, illness or disability.

Galletas 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 work environment, as stated in its Equality and Diversity Plan, Workplace Harassment Procedure, Sexual Harassment Protocol, Gender Violence and other protocols regarding this matter.

Galletas Gullón makes available to its employees the possibility of reporting a situation that harms the well-being of a person related to the company through the Whistleblowing Channel or through its chain of command, Human Resources or Corporate offices.

## 15 Resources for the development of professional activity

Galletas Gullón assumes that its employees commit themselves to make responsible use of the resources and means made available to them, using them exclusively for activities in the interest of Galletas Gullón and not for private purposes. Galletas Gullón employees shall avoid any practices, in particular wasteful activities and expenditures, that diminish the creation of value for the stakeholders and for the company itself.

## Environment

### 16 Protecting the environment and combating climate change

Galletas Gullón carries out its activity respecting and protecting the environment, complying and/or improving the standards established in the environmental regulations that apply to the same, minimizing the impact that its activities may have on the same and promoting actions that contribute to its protection, carrying out and sponsoring research projects, as well as promoting awareness among employees.



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

For this purpose, Galletas Gullón has a working group that assesses all the possibilities regarding the use of renewable energy sources or the emissions reductions initiatives that will enable us to become carbon neutral in the coming years, prioritising this line over compensation.



## 18 **Circular economy**



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

Galletas Gullón approach in this matter is aimed to the fight against food waste, the reduction of the use of plastic and the search of a zero waste production model.

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

To know more about what Galletas Gullón does in circular economy you can read the annual corporate report duly published on the corporate website.

## 19 **Food waste**



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

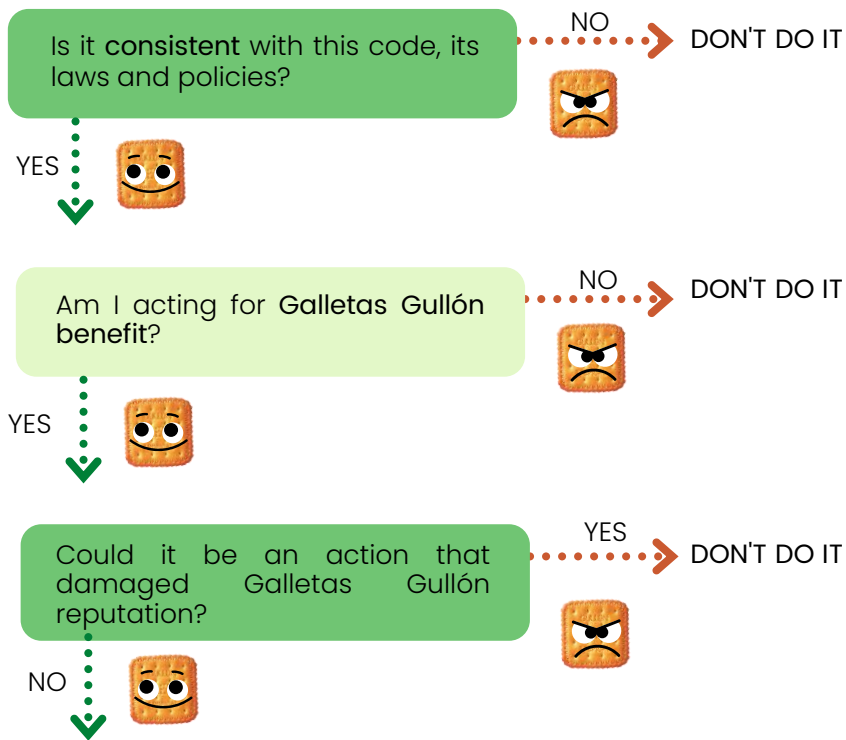
In addition, the little waste generated during the value chain is reused to make animal feed by-products among others.

Taking into account the great productive capacity of Galletas Gullón, the elaboration of a Food Waste Prevention Plan has been initiated, which puts on the table very important aspects such as raising awareness and sensitization among stakeholders, considering that, in addition to belonging to the productive part, we all are consumers and generate household waste.

As for the finished product, there are measures to avoid surplus waste. One of these measures, which also reinforces social commitment, is the donation of products to non-profit organizations.

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

# How to know if I'm acting ethically and in line with this Code of Conduct



If once these questions have been raised, it is not clear the impact of said act/omission, appropriate channels should be used to clarify them before a decision is taken.

These channels are:



Internally in the company:  
Direct contact with Galletas Gullón Corporate Management



Either internally or externally to the company, and in both cases being anonymous or nominative, and with the guarantees and rights of Law 2/2023:  
Through the Whistleblowing Channel explained below

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



## How to use the Whistleblowing Channel

Galletas Gullón makes available to all stakeholders a channel that allows to report with a simple form, potentially irregular activities and behaviours that suppose or may involve the commission of an offence or contrary to this Code of Conduct and that complies with Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and fight against corruption.

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

Reports made through this channel must always meet the veracity and proportionality criteria, and cannot be used for purposes other than those that pursue compliance with current legislation.

The person who reports an irregular act may decide whether or not to identify herself/himself. In the event that the same identifies herself/himself, it shall be considered confidential information and, therefore, shall not be communicated to the respondent without their consent, thus guaranteeing the confidentiality of the identity of the whistleblower and avoiding any retaliation against the complainant by the respondent as a consequence of the whistleblower's complaint.

Galletas Gullón agrees not to take any form of reprisal, direct or indirect, against the stakeholders that have reported through the Whistleblowing Channel a conduct that, in accordance with the provisions of this Code of Conduct and the current legislation, must be denounced, unless the same had 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 complaint process and subsequent investigation.

Notwithstanding the foregoing, the data of the persons who make the report may be provided both to the judicial authorities, if they are required by said authorities as a result of any procedure derived of the complaint, and to the persons involved in any subsequent investigation or judicial proceedings initiated as a result of the investigation. Said data communication to the judicial authorities shall always be carried out in full compliance with the legislation on the protection of personal data.

Galletas Gullón communication to its stakeholders is inspired by respect for the right of information, transparency and in no case to falsehood and deception. This will be done using the tools provided for this purpose and which are considered to be the most appropriate at any given time.

Access to the Code of Conduct is open and available to anyone who wants to know it through <https://gullon.es/responsabilidad-corporativa/> and stakeholders also sign the letter of adherence to the same.



Galletas Gullón is a family-owned company with a history of more than 130 years. Its work for excellence has led us to be a benchmark in healthy biscuits that has crossed the border of more than 125 countries on all continents.

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

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