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## 1. INTRODUCTION

Galletas Gullón, S.A. and its subsidiaries (hereinafter “**Galletas Gullón**”) ethical and responsible management model is based on the commitment of the company and all the people who are part of the same to act ethically and responsibly in all aspects of the daily operation of the company.

## 2. SCOPE

This Ethical and Responsible Management Policy applies to

Any legal entity with a contractual relationship with Galletas Gullón S.A., with a special focus on their value chain.

All interest groups mentioned in its Code of Conduct.

Similarly, and without a direct link to this Policy, Galletas Gullón expects responsible behaviour from all its stakeholders, regardless of the relationship between both parties and will reject any practice that may involve a violation of human rights, applying appropriate measures according to the interest group.

## 3. GOOD PRACTICES

For Galletas Gullón, ethics and responsible management are an essential value for the proper functioning of the company, shared by the entire organization and it is the direct responsibility of the Board of Directors and the CEO to implement them in the daily management, showing our commitment beyond any legal compliance.


The purpose of our organization is to responsibly feed people around the world with our innovative healthy cookies.

The company's vision and values are focused on offering healthy products and being a benchmark brand of healthy nutrition, without losing the essence, tradition, closeness, transparency and commitment to the environment of the company.

This Policy has as its object to establish the basic principles and general action framework for the management of corporate responsibility practices assumed by the company and serve as a basis for the integration of ethical and responsible management into Galletas Gullón's business model and strategy.

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

- ✓ Consumer: ensure that we provide quality and safe products that help to promote their health thanks to the development of a range of products suitable for a healthy diet and lifestyle habits. We work to always provide the consumer the best information and nutritional training.

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- ✓ Customer: we want to be an ally in the development of their business activity, providing products with the right quality and price that make them attractive to consumers.
- ✓ Employee: we are committed to the creation of quality jobs, improve training, professional development and the implementation of preventive measures to ensure their safety and health.
- ✓ Supplier and supply chain: collaborate with suppliers to improve communication, ensure the compliance of Human Rights and be co-responsible in environmental management. Search for production improvements, innovation, quality and efficiency in the supply chain.
- ✓ Citizen: we support initiatives that promote knowledge, improvement and respect for our environment. We are committed to the socioeconomic development and the protection of the environment of the regions where we carry out our activity.
- ✓ Shareholder: we will apply the good governance rules and we undertake to work to meet the expectations they have placed in our company.
- ✓ Public Entities: Gullón shall never attempt to unduly influence any agency or representative of the Public Administration in order to obtain a favourable result for Gullón. The Company shall provide the relevant information in a transparent manner to the relevant government bodies in each case.


Within this ethical and responsible management policy Galletas Gullón undertakes to communicate the objectives set by the company in the Responsible Business Master Plan, the actions carried out to achieve them and to be accountable for the obtained results. Furthermore, the Responsible Business Committee and the Management Team undertake to disseminate this management policy and the Responsible Business Master Plan to all its stakeholders.

One of the main dissemination channels is the corporate website [www.gullon.es](http://www.gullon.es)

Any complaint regarding the application of this Policy shall be addressed through the Whistleblowing Channel, although they may be made by other procedures, and shall be channelled through said channel. It is guaranteed that the bona fide informant shall not suffer any retaliation, guaranteeing if desired, her/his confidentiality and anonymity.

Furthermore, this procedure should be used if there is a reasonable suspicion of non-compliance with the provisions of this Policy, the Code of Conduct or any other procedure established by Galletas Gullón.

In order to have a universal communication channel with Galletas Gullón's stakeholders, a space has been made available to the public in its website to securely, anonymously and effectively share any behaviour that violates human integrity, Galletas Gullón Code of Conduct or any other action that may violate any of the principles or pacts of which Galletas Gullón is part.

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Access: [Whistleblowing Channel \(gullon.es\)](https://gullon.es)

Galletas Gullón also has a Code of Conduct that expresses the general principles that define our corporate culture, as well as the basic behaviour standards that must govern the relations with our various stakeholders.

Galletas Gullón Management shall support, encourage and promote the necessary measures to promote the development of the objectives set by the Responsible Business Committee, and shall provide the necessary resources and training to achieve this goal and ensure the success of the Responsible Business Master Plan.

#### **4. COMPANY'S COMMITMENT**

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

Juan Miguel Martínez Gabaldón  
CEO and General Director of Galletas Gullón