

	CORPORATE POLICY	PO-DG-DDHH/0001
	HUMAN RIGHTS POLICY	Page 1 of 3 01/01/2025

1. INTRODUCTION

Galletas Gullón, S.A. and its subsidiary companies (hereinafter “**Galletas Gullón**”) Human Rights Policy undertakes its commitment to people, the environment in which it works and the planet.

In accordance with the above, Galletas Gullón is guided by its principles through the Responsible Business Master Plan intrinsically linked to the 2030 Agenda and its 17 Sustainable Development Goals. The Aguilar Plan is part of the strategy in which essential issues for the company such as the revitalisation of rural employment, the promotion of a healthier lifestyle, cultural action and promotion and the natural environment are put on the table.

Galletas Gullón is a member of the United Nations Global Compact, thus assuming compliance with its ten principles, focused on human rights, labour norms, the environment and corruption. To reinforce the commitment in these matters, Gullón is certified annually in Ethical Commerce following international standards in the field.

Galletas Gullón is committed to the United Nations Guiding Principles on Business and Human Rights. Under these assumptions Galletas Gullón establishes principles and policies reflected in its code of conduct, available to all stakeholders.

2. SCOPE

This Human Rights Policy applies to any legal entity with a contractual relationship with Galletas Gullón, with a special focus on their value chain.

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.

	CORPORATE POLICY	PO-DG-DDHH/0001
	HUMAN RIGHTS POLICY	Page 2 of 3 01/01/2025

3. GOOD PRACTICES

Galletas Gullón rejects any practice that:

- Discriminates or impairs the dignity of persons based on birth, racial or ethnic origin, sex, religion, conviction or opinion, age, disability, sexual orientation or identity, gender expression, illness or health condition, serological status and/or genetic predisposition to suffer pathologies and disorders, language, socioeconomic status, or any other personal or social condition or circumstance.
- It is linked to child labour and forced or compulsory labour.
- Infringe the freedom of association and collective bargaining.
- Attempt against diversity and discriminate.
- Implement unfair or unfavourable working conditions such as employee safety and health.
- Attempt against the rights of the populations in which it works
- Condition behaviour toward both direct and indirect corruption.

Galletas Gullón carries out and implements the relevant supervision and control procedures, which allow to identify, with due diligence, according to the United Nations framework on Human Rights based on "protect, respect and remedy".

Through obtaining certificates such as *the Rainforest Alliance and the Roundtable on Sustainable Palm Oil*, Galletas Gullón strives to work within its value chain with producers who work with the safety, health and economic stability that everyone deserves.

4. EVIDENCES

The measures that Galletas Gullón carries out are the reflection of a work that seeks to ensure compliance with human rights in its operations and value chain.

For the application and monitoring of the above, Galletas Gullón performs the following actions:

- Monitoring the compliance of the Guiding Principles on Business and Human Rights in their value chain on a universal basis regardless of location.
- The Human Rights Policy will be reviewed annually and updated, if necessary.
- Register of commitment to the Code of Conduct by its suppliers and employees.
- Annual report on the progress in human rights within its corporate memory.
- Verification of its Ethical Trade Principles under the 4 pillars SMETA certification with annual renewal.

	CORPORATE POLICY	PO-DG-DDHH/0001
	HUMAN RIGHTS POLICY	Page 3 of 3 01/01/2025

-Public availability of a fully anonymous Ethical Whistleblowing Channel by which any behaviour potentially contrary to this Policy and the principles by which it is governed can be reported.

5. WHISTLEBLOWING CHANNEL

Any complaint regarding the application of this Policy shall be addressed through the Whistleblowing Channel, although they may be made by other procedures, and will 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.

Likewise, 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 in Galletas Gullón.

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

Access: [Canal de Denuncias \(gullon.es\)](https://www.gullon.es/canal-de-denuncias)

6. COMPANY'S COMMITMENT

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 of Galletas Gullón