

# CRIMINAL COMPLIANCE POLICY

**Aceitunas Torrent S.L.** is the result of a lifetime's dedication to the production, preparation, packaging, commercialization and export of table olives. The word 'tradition' in this company is synonymous with a tangible reality, given that its origins date back to the late nineteenth century when the Torrent family embarked on its venture in the world of this fruit, universally known as the table olive.

Today, with the fourth generation now in charge of the company, the **Torrent** family has forged a business image and reputation over more than 120 years that is one of its most important and valued assets. And it is the company's intention to preserve and promote this reputation through the approval of this Criminal Compliance Policy as the tangible evidence of **Aceitunas Torrent S.L.**'s commitment to comply with the law, in the knowledge that so many years of hard work and dedication can be swiftly compromised as a result of poor business practices or conduct contrary to current law, and most notably the perpetration of crimes within the company or in the course of its business activities.

For all these reasons, it is essential and imperative that all the members of **Aceitunas Torrent S.L.** (partners, directors, managers and employees) always act in accordance with current legislation (including, naturally, criminal law), taking our Code of Ethics and our criminal compliance management system as their essential points of reference.

The basic principle of our Criminal Compliance Policy is the prohibition of any kind of crime within our Organization or on its behalf, taking a zero tolerance approach to any crime and those who commit them.

This prohibition affects all the activities and processes in which a crime could be perpetrated in our company, with regard to both agricultural activities such as the seasoning and preparation of our olives and those related to the national marketing and international export of our products (including both the production and financial aspects of these business activities). And of course this prohibition also extends to our relations with our business partners, namely customers, suppliers and other stakeholders. In this respect there is a documented and up-to-date map for identifying and evaluating criminal risks determined by those activities where there is the possibility or risk of a crime being committed.

This Criminal Compliance Policy has been established as an exercise in leadership by the Governing Body of **Aceitunas Torrent S.L.** and represents the optimal framework of reference for the implementation, review and achievement of criminal compliance objectives, while at the same time minimizing the Organization's exposure to the perpetration of criminal activities through the use of due diligence procedures and other controls developed as part of our criminal compliance management system.

Through this Criminal Compliance Policy, the Governing Body of **Aceitunas Torrent S.L.** also undertakes to oversee the compliance and continuous improvement of all its requirements and the established criminal compliance management system itself; it also undertakes to include in this management system the guiding principles that should govern the organization and management of criminal risk prevention models, in accordance with the Spanish Public Prosecutor's Office Circular 1/2016, of 22 January 2016, on the criminal liability of legal entities.

To ensure the efficient development and surveillance of this criminal compliance management system, the Governing Body of **Aceitunas Torrent S.L.** declares, as part of this Criminal Compliance Policy, the authority and independence of the Compliance Officer (Criminal Compliance Body) as the person responsible for promoting and supervising, on a continuous basis, the implementation and efficiency of this system

throughout the Organization, this individual being duly informed by the Organization's personnel about any incidents or conduct they may be aware of that could lead to criminal risks or the breach of our Code of Ethics, guaranteeing at all times that they will not suffer any kind of retaliation, whether direct or indirect, for complying with this duty of information.

In this respect, all the employees and other members of our Organization, as well as the business partners of **Aceitunas Torrent S.L.**, are required to comply with this Policy and the criminal compliance management system it enshrines. Should this not be the case, disciplinary action will be taken against the former and, to the extent of our abilities, we will temporarily or definitively suspend our relations with the latter.

This Policy was approved by the Board of Directors of **ACEITUNAS TORRENT S.L.** at the board meeting held on 19 December 2018.

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