

A photograph of an olive grove with rows of trees and green olives on the branches. The ground is covered with dry leaves and some green moss.

— ACEITUNAS —
TORRENT

• SINCE 1898 •

CODE OF ETHICS

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0. INTRODUCTION

The Board of Directors of Aceitunas Torrent S.L. is pleased to release the updated version of our Code of Ethics which has been undertaken as a result of the implementation in our Organization of a programme of regulatory compliance to prevent criminal risks (Criminal Compliance Management System), this being understood as an organizational and criminal risk management model aimed at avoiding or preventing the perpetration of crimes within the Organization in accordance with the provisions of Article 31 bis of the Criminal Code resulting from the amendments to this legal text by both Organic Law 5/2010, of 22 June 2010, and the subsequent Organic Law 1/2015, of 30 March 2015.

As it has done to date, the Code of Ethics aims to cover all the principles and values that should inevitably govern our business and day-to-day activities. It also provides a statement of Aceitunas Torrent S.L.'s firm commitment to ethics, integrity and professionalism and strict compliance with the law; and in particular, our attitude of zero tolerance towards the perpetration of crimes and inappropriate behaviour within the Organization. Towards this same purpose we have appointed a Compliance Officer as a key member of the Organization, whose responsibilities include overseeing observance of this Code of Ethics, resolving any queries or incidents relating to the interpretation of this document, and proposing measures for improving or updating it, as well as being responsible for supervising the criminal compliance management system implemented by the Organization to prevent criminal risks.

All the principles, values and recommendations featured in this Code of Ethics must be adhered to scrupulously, and by the same token the precautions it describes must also be taken into consideration. It is only through the exemplary conduct of every single member of Aceitunas Torrent S.L. that we can guarantee the success of our corporate philosophy.

This exemplary conduct not only refers to your professional activities (for which we have assiduously developed policies on quality, environmental health and safety, food health and safety, and the prevention of occupational risks, in accordance with the corresponding regulatory standards) but also refers to our commitment to the wider social community, which, quite naturally, demands that we behave responsibly at all times in accordance with current legislation. In short, the quest for excellence in our business dealings must by necessity go hand-in-hand with the irreproachable conduct of every member of the Organization.

For all these reasons, we encourage you to make yourselves familiar with the updated content of this Code of Ethics and put it into practice, and we thank you in advance for all your hard work and commitment to the values of our Organization that are reflected in this document.

With kind regards,

— The Board of Directors

1. ACEITUNAS TORRENT IDENTITY

The Declaration of the Mission, Vision and Values of Aceitunas Torrent, S.L. is a statement that sums up the organization's main strategic proposals, as well as its essential values that are known, understood and shared by all our stakeholders.



VALUES

There are six key values inherent in the Aceitunas Torrent brand.



Commitment

This refers to the capacity to perform our work with professionalism, responsibility and loyalty in order to achieve a product or service with a high standard of quality that both meets and exceeds the expectations of our customers.

This commitment obviously includes total respect for current legislation in both Spain, where our Organization is based, and in the other countries where we market our products, for which we have developed a Regulatory Compliance Policy that applies to the whole Organization with a particular emphasis on the prevention and reporting of possible criminal behaviour, with the implementation of the corresponding criminal compliance management system for the prevention of criminal risks.

Perseverance

This is a key life value when striving to achieve a specific outcome. Continuous effort is necessary to achieve the optimum results that will endure in the long term.

Creativity

This is the source of innovation which, when implemented in our processes, enables us to adapt to a dynamic environment, generating added value for our customers and improving our market position.

Integrity

Integrity is what enables us to do what we say we are going to do, to keep our promises, and to act in accordance with our ethical principles. Integrity is what guarantees our credibility as a company.

Excellence

This is the quest for continuous improvement, meeting the challenge of always offering the best products and services and constantly surpassing our customers' expectations, with the result that our corporate image and reputation are strengthened on a daily basis.

Teamwork

This is a commitment based on shared knowledge, experience and effort, with each individual contributing the best of themselves and accepting responsibilities in order to achieve a common goal.



MISSION

Our mission is to offer our customers the best possible service, products, quality and value while remaining true to our Declaration of Commitments as shown below.

1. Commitment to our land
2. Commitment to our history
3. Commitment to our team
4. Commitment to our products
5. Commitment to our customers
6. Commitment to our suppliers
7. Commitment to oneself
8. Commitment to Aceitunas Torrent
9. Commitment to the law

VISION

Our vision is to be the best possible version of ourselves, maximizing the potential of Aceitunas Torrent and guaranteeing its constant renewal.



Torrent 2020

As a short-term objective, the company has established Torrent 2020 as a horizon to achieve sustainable growth, bridge the gap with our competitors and open up new markets. At the same time we aim to consolidate our leading position in markets where we have a large market share, at all times offering greater professionalism in our processes and services, with the utmost respect for the regulatory standards of the different aspects of the Organization's activities and current legislation.

2. ACEITUNAS TORRENT AS A BUSINESS

2.1. STAKEHOLDERS

This Code of Ethics sets out a series of principles and guidelines for action that are not only aimed at all the employees of Aceitunas Torrent, regardless of their position or responsibilities within the company, but also at Aceitunas Torrent's stakeholders – customers, suppliers, shareholders, the public administration, and external partners – and the people who represent them, so that they can operate in accordance with the company's values, policies and general objectives.

Consequently, Aceitunas Torrent will promote among its suppliers and partner companies the adoption of standards of conduct that are commensurate with those defined in this Code of Ethics, and may ask them, where applicable, to make a formal undertaking to comply with the principles and values therein. Likewise, as an evaluation criterion when selecting suppliers and partner companies, Aceitunas Torrent will take the existence in their own organizations of codes of ethics or corporate conduct that are the same or similar to those of Aceitunas Torrent.

This Code of Ethics is available to all our stakeholders and can be read in full on our website www.aceitunastorrent.com



2.2. CONFIDENTIALITY

In order to protect the company's private information, our employees are required to sign a confidentiality clause as part of their contract.

Employees who, in the course of their work, have access to the information of other employees and/or the company's private information, are required to respect and protect the confidentiality of this information and make responsible use of it.

In some cases, customers may wish to keep their names and the fact that they are contracting our services confidential. Consequently, as a general rule, we will not publicly disclose the names of customers and jobs that are not in the public domain unless specifically authorized by the customer to do so. This obligation to protect customers' private data applies even when you are no longer associated with the company.

We must avoid using customers' data or work-related information for personal benefit. Taking advantage of access to customers' information is not only unethical but may also infringe legal restrictions and the standards of regulatory authorities on the inappropriate use of internal information.

By the same token, employees are urged to ensure that their public communications do not damage the company's reputation, violate confidentiality, or damage relations with customers or partners in joint undertakings or strategic alliances. It is always advisable to consult the company's public relations and/or communication officers if in any doubt.

They can not only help you to avoid any risks but also assist in structuring and transmitting your messages in a way that best meets your own and the company's objectives.

Finally, it should be pointed out that it is not permitted to use technologies, brands, methodologies or any other kind of information that belongs to the company for private purposes or disclose them to others, even if they have been obtained or developed by the employee in the course of their work.



2.3. COMPANY ASSETS

All employees and partners of Aceitunas Torrent must operate diligently to protect the company's assets, acting responsibly and in accordance with the operating procedures that have been established to regulate their use.

Employees are recommended to use the assets entrusted to them with care and discretion, and to avoid inappropriate use of assets that might cause damage. With regard to usage, it is important to exercise common sense. For example, the occasional telephone call or email from work for personal reasons is acceptable. Excessive use of the email or telephone for personal use would be viewed as improper use of company assets.

The theft of the company's assets, whether this refers to physical theft – such as the unauthorized removal of a product, equipment or information from the company – or theft through intentional embezzlement or falsification of hours worked and expenses may result in dismissal.

Employees may not use the company's facilities, resources or personnel for private purposes unless this has been expressly authorized by the company's general management.

2.4. CONFLICTS OF INTEREST

It is essential to notify the Compliance Officer who, in turn, will report to the company's governing body, of any incident or situation that might entail or cause a conflict of interest in the company, particularly in the case of an employee or manager. The affected party must abstain from intervening in the resolution of the conflict and from carrying out any action in this respect without the express authorization, where applicable, of the governing body.

2.5. CONTRIBUTION TO THE COMMUNITY

Aceitunas Torrent is made up of a group of people who, working as a team, offer services and products to their customers. The economic dimension of the firm does not, however, absolve it from recognizing that its *raison d'être* is the community in which we operate, for which reason the company's work and attitudes support the principles and values that underpin the society in which we live.

Being fully aware of our involvement in this greater community, we act in accordance with our principles, seeking not only to obtain benefits for the business but also benefits for society through the following actions.

- The company is committed to the economic and social growth of the community in which it operates through the creation and perpetuation of decent, productive jobs.
- The company adheres to the principle of political neutrality, avoiding interference in the communities in which it operates as a further demonstration of its respect for the different opinions of the people associated with the firm.
- The company respects national and international laws and conventions, incorporating this commitment to regulatory compliance and the prevention of illegal or criminal behaviour into our value chain, and promoting a sustainable and competitive commercial context in accordance with the law.
- The company makes responsible use of the social media. Our advertising and promotions are designed to have the maximum possible impact among the audience to

which they are addressed, so we are responsible for all the messages we communicate.

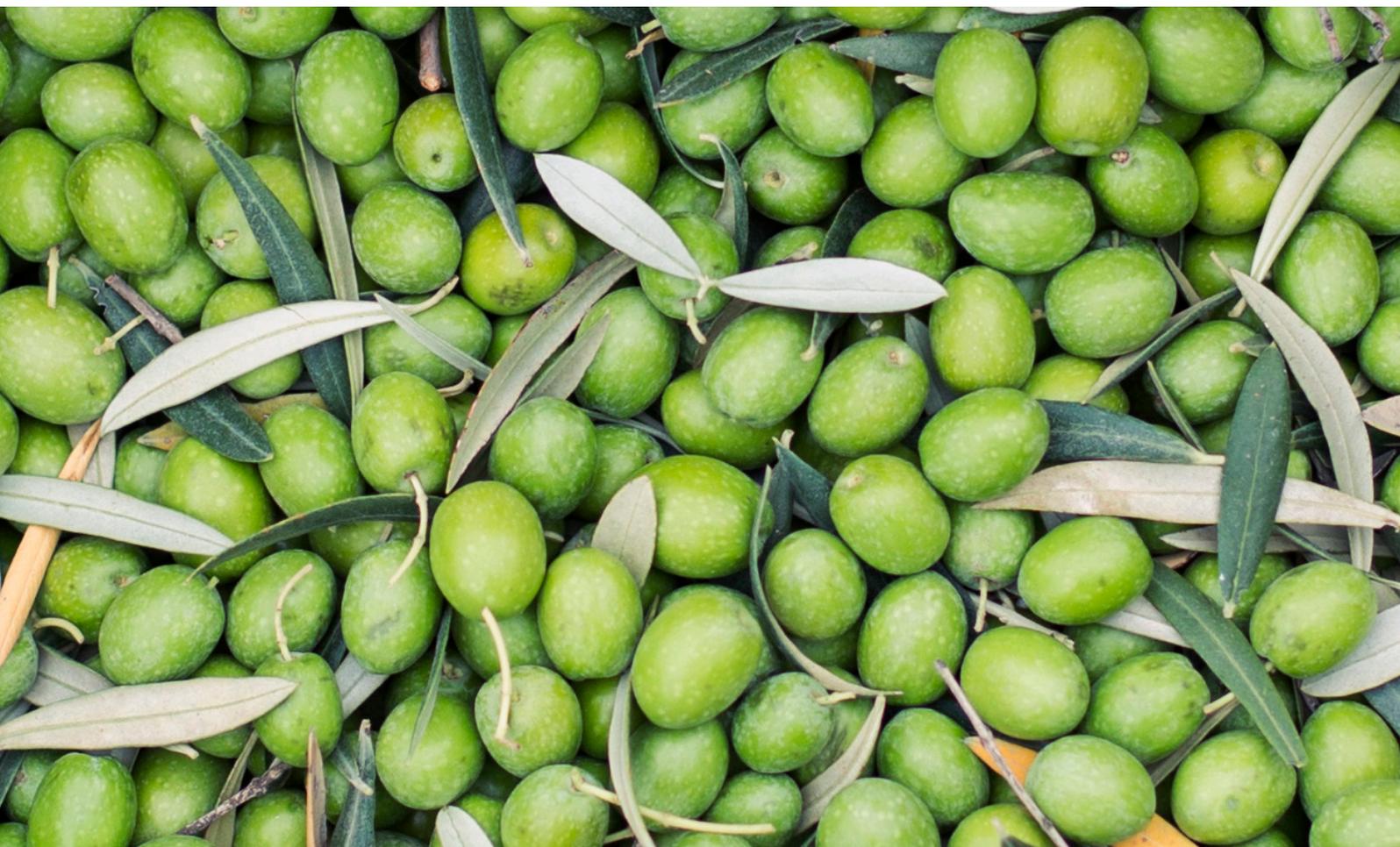
- The company must provide solutions to strengthen the local economy, and for this reason we support sporting endeavour and the values it conveys (achievement, teamwork and effort, amongst others) through the sponsorship of local sport. Likewise, the company also contributes to the regional economy by promoting local purchasing and hiring staff from the nearest population centres.

2.6. RELATIONS WITH THE PUBLIC ADMINISTRATION

Aceitunas Torrent respects the laws and regulations of the different markets in which we operate, maintaining a relationship of transparency and the utmost cooperation with all public administrations. To underline this commitment, and

so that all our team members are aware of the steps to follow in negotiations, we have established the following rules.

- Always deal with public authorities and institutions in a lawful and respectful manner, commensurate at all times with the current legal system and never accepting or offering gifts or commissions.
- Collaborate with these entities in the quest for the general social interest.
- Be transparent and honest in relations with public authorities. In particular, you should exercise the maximum vigilance and control regarding compliance with the obligations arising from the grant of any kind of subsidy or public aid.
- Never accept or offer bribes, whether in cash or in kind.
- Making contributions to political parties and public institutions is prohibited.



2.7. RELATIONS WITH SUPPLIERS AND CUSTOMERS

It is the view of Aceitunas Torrent that our customers and suppliers are two of the company's cornerstones, which is why their satisfaction is paramount to the company's operations.

The selection of suppliers and subcontractors must be done using the criteria of transparency, objectivity and free competition in order to guarantee the quality of the goods or assets being acquired and the most advantageous economic conditions.

We are committed to building strong and lasting relationships with all our customers and suppliers, at all times with the sole aim of seeking and selecting suppliers whose business practices are respectful of human dignity, compliant with tax and employment legislation, with a particular emphasis on aspects such as the prevention of child labour, are respectful of the environment and do not endanger the company's reputation.

Accordingly, when selecting suppliers, Aceitunas Torrent will use as a criterion the existence or adoption, in their respective organizations, of codes of ethics or corporate conduct that are the same as, or similar to, those of Aceitunas Torrent.

Aceitunas Torrent may also include compliance with its Code of Ethics as an integral obligation in the contracts it signs with its suppliers, with the specific provision that any action contrary to this Code may be a determining factor in the termination of any such contracts.

Aceitunas Torrent also undertakes not to publicly name the suppliers with which it works, with the aim of engaging in honest negotiations and not contributing to unfair competition in the market. At the same time, the company will always seek excellence in the goods and services it acquires so that its customers and consumers obtain the satisfaction they expect.

It is essential to select suppliers based on the suitability of their products or services, as well as their price, delivery conditions and quality, neither accepting nor offering gifts or commissions, whether in cash or in kind, that may infringe the rules of free competition in the production and distribution of goods and services.

The company's products and services must be guaranteed and any claims or complaints from consumers and users must be dealt with quickly and effectively, seeking their satisfaction above and beyond mere compliance with current regulations.

2.8. RELATIONS WITH COMPETITORS

Aceitunas Torrent always sees competition as a stimulus for the continuous improvement of our products and, in turn, the way we approach productive and commercial processes with our customers.

In this respect, Aceitunas Torrent is committed to always observing policies of transparency and honesty with regard to our competitors, as well as operating in the market at all times with scrupulous respect for current legislation.

3. ACEITUNAS TORRENT AS AN EMPLOYER

Commitment to training

Aceitunas Torrent employment policy is geared towards managing talent and ensuring that its employees are committed to the company's projects. To do so, it encourages the professional development of all its employees by means of internal promotion policies, recognition of merit and continuous training plans, amongst other measures.

Any employee who is interested in retraining and/or undertaking a training course, provided that it is related to their job position, is welcome to suggest it to the company's Human Resources department, who will in turn speak to the management of Aceitunas Torrent. If the course is considered to be beneficial for the employee's personal and professional development, the company will cover the costs of the training.



Job quality

Our human capital is one of the fundamental assets of Aceitunas Torrent, for which reason the company puts a particular emphasis on the wellbeing of its team of staff. Our objective is that Aceitunas Torrent provides the optimum workplace where our employees can develop both personally and professionally. Consequently, we recognize their right to work in a safe and healthy environment in which their skills are recognized, aiming to achieve the optimal work-life balance.

For example, Aceitunas Torrent offers its employees the chance to acquire a kindergarten-cheque and private health insurance with advantageous conditions.

The company also works on a daily basis to guarantee job quality. It fosters the provision of stable, quality jobs with occupational content that promote the constant improvement of its staff's skills and aptitudes. The company also strives to associate the remuneration and promotional opportunities of its employees according to their merit and abilities.

Likewise, at both its factory and offices, Aceitunas Torrent facilitates internal promotions and career plans for job positions to which employees can accede.

It is also worth noting that since 2011 the company has been affiliated with the United Nations Global Compact, an international initiative that promotes corporate social responsibility (CSR) and sustainable development through the implementation of its Ten Principles.

One of the most important points is the Prevention of Occupational Risks programme de-



veloped by the company, as the management decided to establish a public and formally-documented declaration of its commitment to health and safety at work, including it in its Quality, Environmental and Food Safety policies.

Equal opportunities and non-discrimination

The company promotes equal opportunities at every level – senior management, middle management and all other employees – with a particular emphasis on equality between men and women in relation to access to employment, training, professional promotions and working conditions.



4. SHAREHOLDERS, MANAGEMENT, EMPLOYEES AND PARTNERS

The company is aware that teamwork is an essential factor for the company's optimum operations and future, and that the actions and decisions of all its employees and partners determine, to a large extent, the reputation that Aceitunas Torrent projects externally. For this reason, the company has established certain guidelines for conduct to be followed by its shareholders, management, employees and partners.



Shareholders and owners

The management team of Aceitunas Torrent works towards the goal of a well-administered, socially responsible, efficient and profitable company that will provide its shareholders with a reasonable and sustained return on their investment, creating long-term value.

The high ethical standards of our shareholders, owners, directors and managers is essential for the company to be able to achieve its goals, to the extent that they represent an essential requirement to guarantee and balance the rights and interests of all its stakeholders. To achieve these ends, the following guidelines have been established:

- Establishing the company as an instrument at the service of the creation of wealth, making its essential corporate purpose of making a profit compatible with sustainable social development and respect for the environment.

Ensuring that all the company's activities are conducted in an ethical and responsible manner, at all times in strict compliance with current legislation.



The ethics of the company's shareholders, owners, directors and managers is essential for it to be able to achieve its corporate purpose.

Always anticipating and avoiding any conduct within the Organization that may be contrary to the law, particularly those that might constitute a crime.

- Establishing the company as an institution with medium and long-term goals, avoiding the desire for short-term enrichment that might compromise its continuity.
- Exercising in an informed and responsible manner their voting rights at General Shareholders' Meetings and, when doing so, always demanding that the company engages in ethical action, including the approval of the relevant Code of Ethics and making every effort to implement it effectively.
- Seeking the appropriate balance between capital and work so that the company's employees receive a fair salary in return for the work they perform.
- Seeking the appropriate balance between capital and work so that the company's employees receive a fair salary in return for the work they perform.
- Respecting intellectual and industrial property rights and complying strictly with all the laws and regulations concerning the use and reproduction of computer software.
- Appointing as administrators and directors those individuals who meet the right conditions in terms of qualifications and experience and who exercise their management tasks in a professional, ethical and responsible way, adhering at all times to the principles and values described in this Code of Ethics and in strict compliance with current legislation.

Management

All directors and managers must ensure that their staff understand and respect the principles, values and conduct described in this Code of Ethics, which obviously are binding upon and must be observed by the management according to the same terms and conditions as those demanded from the Organization's employees.

Similarly, the management should ensure that all the monitoring procedures established by the company comply with this Code of Ethics and that these policies and procedures are implemented correctly.

Detailed below are certain specific guidelines to be adhered to by the directors and middle management (without prejudice to the general obligation to observe the contents of this Code of Ethics, which also applies to them).

- To perform their job in a professional, ethical and responsible manner, adhering at all times to the principles and values described in this Code of Ethics and in strict compliance with current legislation.
- To guarantee the safety of all the company's employees, for which purpose operational instructions have been esta-

lished for each machine, detailing every sequence of work of the operator and how he/she should perform the task to avoid occupational accidents. These instructions also describe the mandatory PPE for each sequence.

It should also be noted that Aceitunas Torrent has a Risk Prevention Officer who is responsible for overseeing employee safety.

- To set an example and encourage compliance with the company's Code of Ethics by making it known and establishing the appropriate mechanisms to guarantee its implementation.
- To encourage motivation and communication among the members of their teams, fostering a participative style of management that promotes communication, delegation, initiative, teamwork and collaboration with others, as well as being results-orientated.
- To avoid situations that involve or may generate a conflict of personal interest with the interests of the Organization, under no circumstances using their position within the company to obtain advantages or business opportunities either for themselves or third parties.





All management personnel are responsible for ensuring that their staff understand and respect the principles, values and conduct described in this Code of Ethics.

In the event of any doubt as to whether a particular activity may involve a conflict of interest, the matter should be referred to the Compliance Officer, who will in turn report to the company's governing body, during which time the director or manager concerned should refrain from engaging in the activity in question until such time as the governing body has authorized it, if applicable.

- To report regularly and accurately to the owners and shareholders on the company's current situation and prospects.
- To maintain the company's books and records accurately and honestly in strict

compliance with current mercantile and accounting regulations so that they allow information to be sourced and decisions to be made in a conscientious and responsible manner.

- To deal with the payment of and compliance with the company's debts and obligations without delay or unjustified breaches of contract, and to collect the company's credits with the diligence required in each case.
- To prepare and keep updated a succession plan for the company's key positions so that its continuity does not depend on the permanence of any administrator or director.
- To select staff and subordinates in accordance with the principles of merit and ability, at all times operating solely in the interests of the company.

Employees

INFORMATION POLICY

All employees will be informed of, and must accept, the principles and criteria on which Aceitunas Torrent bases its professional development and the efficiency of its management.

COOPERATION, TRUST AND TRANSPARENCY

Employees are encouraged to adopt an attitude of active cooperation, speed and mutual respect. Partners and employees help to ensure that the company offers products and services that are increasingly competitive. Through teamwork, employees are urged to seek fair resolutions and make decisions based on merit, working fairly and honestly with all the company's stakeholders, and maintaining the appropriate level of transparency in all decision-making.

RIGHTS OF ASSOCIATION

The company recognizes its employees' rights of association, unionization and collective bargaining.

RESPECT AND PROTECTION AGAINST HARASSMENT

It is essential to treat all employees with dignity, respect and fairness, taking into account their different cultural sensibilities and not discriminating against employees based on their gender, race,

religion, family situation, age, nationality or any other personal or social condition that is unrelated to their individual merit and ability.

Aceitunas Torrent has a specific protocol in place for the prevention of workplace or sexual harassment which must be observed by every member of the Organization and allows employees to report behaviour that might constitute a situation of harassment, which in all cases represents an infringement of this Code of Ethics.

INTEGRATION

The company seeks to ensure the occupational integration of new employees and people with disabilities or impairments, getting rid of all kinds of barriers in the workplace to facilitate their inclusion.

REPRESENTATION AND DECISION-MAKING

No employee may represent the company in commercial relations in which he or she may

Employees should make responsible use of the company's assets, seeking to keep them in a perfect state of operation and use and trying to maximize their capacity and prolong their useful life.



have a personal interest, whether direct or indirect, to the detriment of the company.

It should be noted that decision-making is based solely on professional criteria to ensure that hierarchical positions, business activities and influence are not used for the purposes of personal gain.

The company may only be represented in dealings with customers, suppliers, competitors and public or private organizations with the express authorization of the company's General Manager, apart from those cases in which it is inherent in the responsibilities of the position.

POSSESSION OF WEAPONS

It is absolutely prohibited for any employee, partner or subcontractor to bear personal arms at any time in the company's or a client's establishment or while on company business in any location whatsoever.

Any employee, partner or subcontractor who attends work with a weapon or is found to be in possession of a weapon while on company business will be subject to the relevant disciplinary action, which might even include immediate dismissal.

PROTECTION OF ASSETS

The safekeeping and protection of company assets is the responsibility of every single member of the company. Company assets should be understood not just as its buildings, vehicles, machinery or furniture but also its plans, designs, formulas, processes, systems, technologies, drawings, business strategies, product launch plans and promotional campaigns, amongst others.

People should make responsible use of the company's assets, striving to keep them in a perfect state of operation and use and making every effort to maximize their capacity and prolong their useful life.

PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

All employees must undertake to protect the company's industrial and intellectual property, which primarily entails its different brands.

Likewise, the industrial and intellectual property of third parties must be respected by strictly following the procedures established to prevent the infringement of third-party rights.

GIFTS

Staff must refrain from giving or receiving gifts, benefits or favours that may influence the company's commercial relations with others. Employees may not:

- Accept cash.
- Accept any kind of gift or entertainment that might be considered illicit, unlawful or against public decency.
- Accept a gift if this might make them feel compromised.
- Accept a gift or entertainment as part of an agreement to do something in return for said gift or entertainment.

Apart from the examples given above, the giving and receiving gifts is permitted provided that this does not affect the employee's interests or his/her commercial relationship with other people or organizations. The gift will be kept at the disposal of the Organization either for a draw among all the members of the company or to be given to charity.

CORRUPTION

Aceitunas Torrent business is conducted in a transparent way and any form of corruption is unacceptable. This kind of conduct is not consistent with the spirit of Aceitunas Torrent.

You should never request, accept or offer, whether directly or indirectly, gratuities, bribes or

handouts of any kind. This includes the improper exchange of money, loans, special privileges, personal favours, benefits or services. It is absolutely forbidden to offer any kind of bribe to public authorities or public officials in the form of personal benefits, even if this is to fulfil your obligations or expedite your working routine; both these procedures would be seen as a criminal offence.

Employees must inform the Compliance Officer, who will report to the company's governing body, of any requests for handouts or gifts (facilitation payment) so that the appropriate measures can be taken.

CONFLICTS OF INTEREST

All employees must avoid situations that entail or may cause a conflict of their personal interest with those of the Organization; under no circumstances should they use their position in the company to obtain advantages or business opportunities for themselves or for third parties.

If there is any doubt as to whether a certain activity may involve a conflict of interest, the employee must immediately inform the Compliance Officer, who will report to the company's governing body, and the employee in question must refrain from carrying out the activity in question until such time that he/she is authorized to do, if applicable, so by the governing body.

COMPLIANCE WITH THE CODE OF ETHICS AND LEGISLATION

This Code of Ethics must be complied with by all the employees of Aceitunas Torrent, who must confirm by whatever reliable means have been established for this purpose that they have read the Code, that they understand what it involves, and that they accept it.

The Code of Ethics forms part of the managerial authority of the employer, and consequently its contents effectively form part of the obligations to be met by the employee. With regard to new employees, the obligation to comply with the Code of Ethics may be expressly included in the form of an additional clause in their individual employment contract, along with their express acceptance of the Code.

All employees (as well as shareholders, owners and management staff) also undertake to comply with current legislation and the company's internal procedures. Moreover, all employees must be familiar with the legislation that affects their work, for which they may ask their superiors, where applicable, for accurate information. The company undertakes to provide all the necessary measures to ensure that the Organization's members are aware of the internal and external rules and regulations relevant to the performance of their respective functions.

All employees must avoid engaging in any conduct that might damage the company's reputation or adversely affect its interests. Likewise,



they must report, through the communication system described in the Code of Ethics, any situation they are aware of that involves a breach of this Code of Ethics or current legislation, and especially any behaviour that might constitute a crime.

Partners

Partners who undertake external work of a personal nature must ensure that these activities do not cause any conflict with the company's interests.

- They should take particular care over the assets entrusted to them and be sure to

report to their superiors any situation that might lead to their loss or misuse.

- Company funds may never be used for personal ends.
- Partners should observe the provisions described in this Code of Ethics and the company is entitled to seek their express and formal acceptance of them as a determining condition for contracting their products or services.
- Partners must promise the Organization to scrupulously observe current legislation, making a particular point of avoiding any conduct that might constitute a crime.



5. QUALITY, HEALTH & SAFETY AND THE ENVIRONMENT

Quality

Since its creation in the late nineteenth century, the company has adhered to the maxim of achieving customer satisfaction by offering safe, high quality foodstuffs on which our customers can rely, and striving to anticipate their needs.

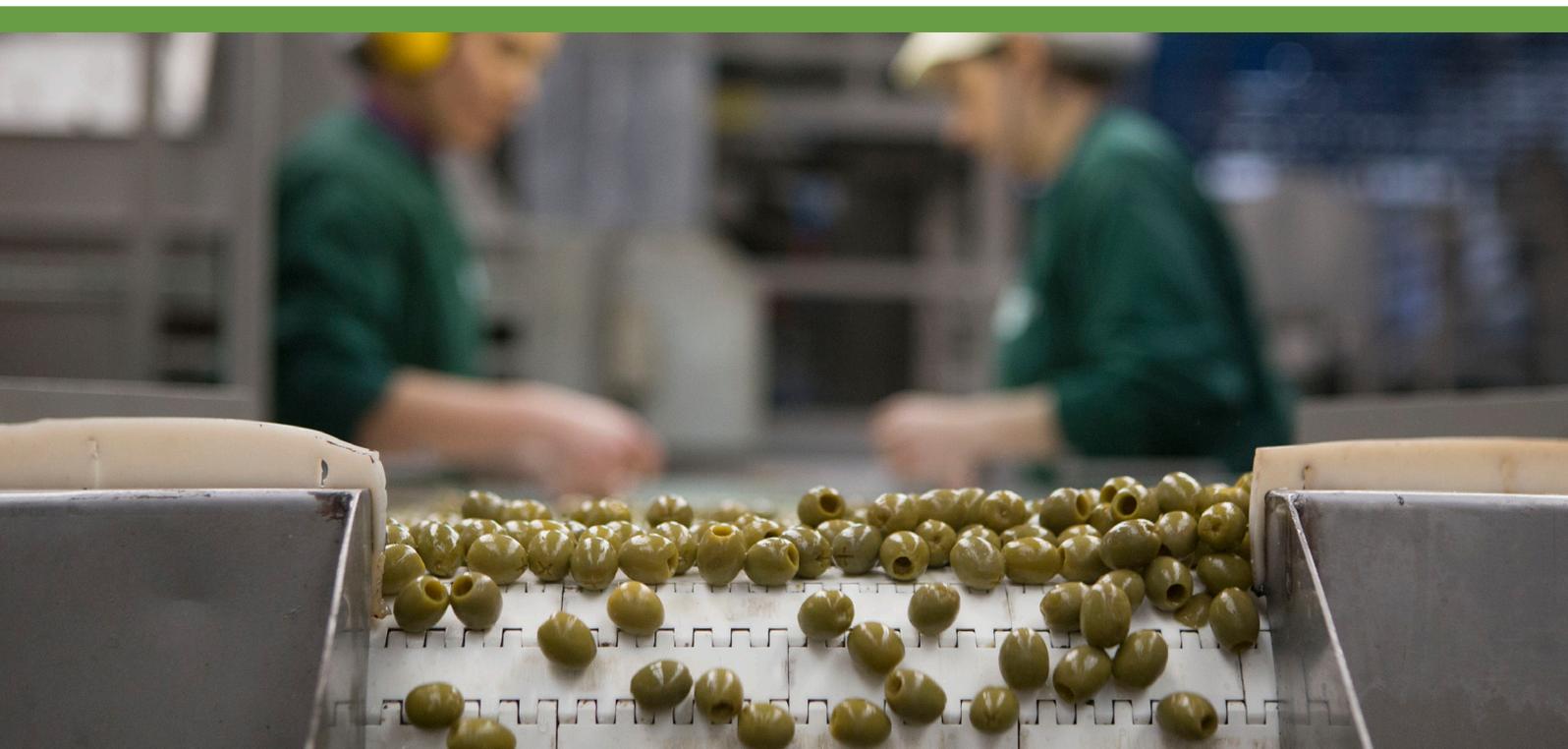
For this reason, Aceitunas Torrent has established the constant quest for quality in its products and services as the guideline for its business activities. To achieve this, the company undertakes to provide its employees with the necessary resources to implement the most appropriate quality management systems at all times, and has drawn up a Manual as a guide to best practices.

It should be noted that the rights of our customers are guaranteed by our quality control and product traceability codes, as well as customer service. We undertake exhaustive checks to verify that all the

order specifications (from the product through to packaging and labelling) are fulfilled.

We also conduct internal audits with suppliers and our own processes, where our quality control officers are responsible for checking that during the manufacturing process each and every one of the safety parameters is met (hydrometers, sterilization and pasteurization, amongst others) in strict compliance with current legislation in each particular area.

Since 2007 the company has had ISO:14001 certification, the international standard for environmental management systems, along with ISO:9001 certification, the international standard for quality management systems. In addition, the company renews its IFS and BRS certificates every year, which are the generally recognized standards for food quality and safety.



IFS and BRS certificates

Certificado ES1211550
This is to certify that

ACEITUNAS TORRENT, S.L.
Avda. de Córdoba, 110, 14920 Aguilar de la Frontera (Córdoba), Spain
BRC SITE CODE: 1183762
has been assessed and certified as meeting the requirements of

Global Standard for Food Safety
Issue 8: August 2018
Achieved Grade A
Audit Programme: Announced

For the following activities
Dressing and grading of green olives (whole, pitted, sliced, stuffed with pepper) packed and pasteurized in jar glass and can. Pickling, grading and oxidation of black olives (whole, pitted, sliced) packed and sterilized in jar glass and can.
Adorezo y clasificado de aceitunas verdes (enteras, deshuesadas, en rodajas y rellenas de pimiento) envasadas y pasteurizadas en vidrio y lata. Adorezo, clasificado y oxidación de aceitunas negras (enteras, deshuesadas y en rodajas) envasadas y esterilizadas en vidrio y en lata.

Product Categories: 11
Exclusions from scope: None
Date of Evaluation 04 February 2019
Certificate Issue Date 20 March 2019
Re-Evaluation Due Date: From 09 January 2020 to 06 February 2020
Certificate Expiry Date 19 March 2020
This certificate supersedes all other certificates bearing this certificate number with earlier certificate issue dates.
If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact audit@brcglobalstandards.com
Visit the BRC Directory www.brcdirectory.com to validate certificate authenticity

AUDITOR NUMBER
179079

Authorized by

UKAS
PRODUCT
CERTIFICATION
0005

This certificate remains the property of
SGS United Kingdom Ltd
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HC SGS BRC FOOD Issue 8 0319
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Certificado / Certificate ES1313968

Certificado / Certificate
El organismo de certificación SGS-ICS GmbH confirma que las actividades de proceso de /
The certification body SGS-ICS GmbH confirms that the processing activities of

ACEITUNAS TORRENT, S.L.
COID: 31197
Registro General Sanitario (RGSEAA) / Veterinary control number: 21.88100
Avda. de Córdoba, nº 110
14920 Aguilar de la Frontera (Córdoba), Spain
cumple los requisitos de / meets the requirements of the

IFS Food
Version 6.1, Noviembre de 2017
y otros documentos normativos asociados para el alcance de auditoría,
and other associated normative documents for the audit scope

Adorezo y clasificado de aceitunas verdes (enteras, deshuesadas y en rodajas) envasadas y pasteurizadas en vidrio y lata. Adorezo, clasificado y oxidación de aceitunas negras (enteras, deshuesadas, en rodajas) envasadas y esterilizadas en vidrio y en lata.
Dressing and grading of green olives (whole, pitted and sliced, stuffed with pepper) packed and pasteurized in jar glass and can. Pickling, grading and oxidation of black olives (whole, pitted, sliced) packed and sterilized in jar glass and can.
Adorezo de Producto / Product scope: 2: Frutas y verduras / Fruit and vegetables
Alcance Tecnológico / Technology scope: A, B, C, F
En el Nivel Superior con una puntuación del 97,13% /
on Higher Level with a score of 97,13%.

Edición / Issue: 7
Fecha de auditoría / Date of the audit: 04/02/2019 - 05/02/2019
Siguiente auditoría a realizar dentro del periodo de tiempo /
Next audit to be performed within the time period: 13/12/2019 - 21/02/2020 o
sin previo aviso / or unannounced
Fecha de emisión del certificado / Certificate issued on: 21/03/2019
Certificado válido hasta / Certificate valid until: 02/04/2020

Authorized per / Authorized by

Christian Rathje
Head of Certification Body

Joachim Schütz
Global Product Manager IFS
SGS-International Certification Services GmbH
Rödelmattstr. 11, CH-2049 Hertenau (Germany)
t +49 (0)40 30 101 301 f +49 (0)40 33 04 098 www.sgsgroup.de
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ISO:9001 and ISO:14001 certificates

BUREAU VERITAS
Certification

Certificación
Certification

Concedida a / Awarded to
ACEITUNAS TORRENT SL
AVD DE CORDOBA 110
14920 AGUILAR DE LA FRONTERA
SPAIN

Bureau Veritas Certification certifies that el Sistema de Gestión ha sido auditado y encontrado conforme con los requisitos de la norma:
Bureau Veritas Certification certifies that the Management System has been audited and found to be in accordance with the requirements of standard:

NORMA / STANDARD
ISO 14001:2015
El Sistema de Gestión se aplica a:
Scope of certification:

ADREZO, ENVASADO Y COMERCIALIZACIÓN DE ACEITUNA DE MESA.
DRESSING, PACKAGING AND COMMERCIALIZATION OF TABLE OLIVE.

Número del Certificado / Certificate Number: ES103022-1
Directora de Certificación / Certification Manager

Aprobación original / Original approval date: 24/08/2007
Certificado en vigor / Effective date: 24/05/2019
Caducidad del certificado / Certificate expiration date: 23/05/2022

Este certificado está sujeto a los términos y condiciones generales y particulares de los servicios de certificación
This certificate is valid, subject to the general and specific terms and conditions of certification services

Entidad de Certificación / Certification Body: Bureau Veritas Iberia S.L.
C/ Vaporiño Primera 22-24, Edificio Cadea, Pol. Ind. La Grana, 28108 Alcobendas - Madrid, Spain

BUREAU VERITAS
Certification

Certificación
Certification

Concedida a / Awarded to
ACEITUNAS TORRENT SL
AVD DE CORDOBA 110
14920 AGUILAR DE LA FRONTERA
SPAIN

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Bureau Veritas Certification certifies that the Management System has been audited and found to be in accordance with the requirements of standard:

NORMA / STANDARD
ISO 9001:2015
El Sistema de Gestión se aplica a:
Scope of certification:

ADREZO, ENVASADO Y COMERCIALIZACIÓN DE ACEITUNA DE MESA.
DRESSING, PACKAGING AND COMMERCIALIZATION OF TABLE OLIVE.

Número del Certificado / Certificate Number: ES103021-1
Directora de Certificación / Certification Manager

Aprobación original / Original approval date: 06/05/2004
Certificado en vigor / Effective date: 24/05/2019
Caducidad del certificado / Certificate expiration date: 23/05/2022

Este certificado está sujeto a los términos y condiciones generales y particulares de los servicios de certificación
This certificate is valid, subject to the general and specific terms and conditions of certification services

Entidad de Certificación / Certification Body: Bureau Veritas Iberia S.L.
C/ Vaporiño Primera 22-24, Edificio Cadea, Pol. Ind. La Grana, 28108 Alcobendas - Madrid, Spain

Health & Safety

Aceitunas Torrent views people's health and safety as an essential value and consequently all of us share in the commitment to make this a priority.

The company assumes the responsibility of providing its employees with the necessary resources to perform their functions safely in a healthy environment.

Meanwhile, workers must make responsible use of the equipment they have been assigned when undertaking high-risk activities, and should encourage compliance with risk prevention practices among their colleagues and subordinates.

We are committed to maintaining a safe and healthy workplace both for our employees and

our customers, and the company will make whatever investments are necessary to implement control protocols in the field of occupational risk prevention. Finally, we must emphasize the points below in order to ensure the safety of our production processes as well as the welfare of our employees:

- The abuse of alcohol, drugs or other substances in the workplace is prohibited and subject to disciplinary action, and in the case of illegal drugs, legal action will be taken. The abuse of alcohol or any other drug or substance, whether legal or illegal, can interfere with your ability to fulfil your professional responsibilities and obligations; endanger the health and safety of the user and other people; damage the company's business and reputation, and lead to a legal risk. Further-



more, it is prohibited for partners and staff to engage in company business or represent the company while under the influence of alcohol or drugs.

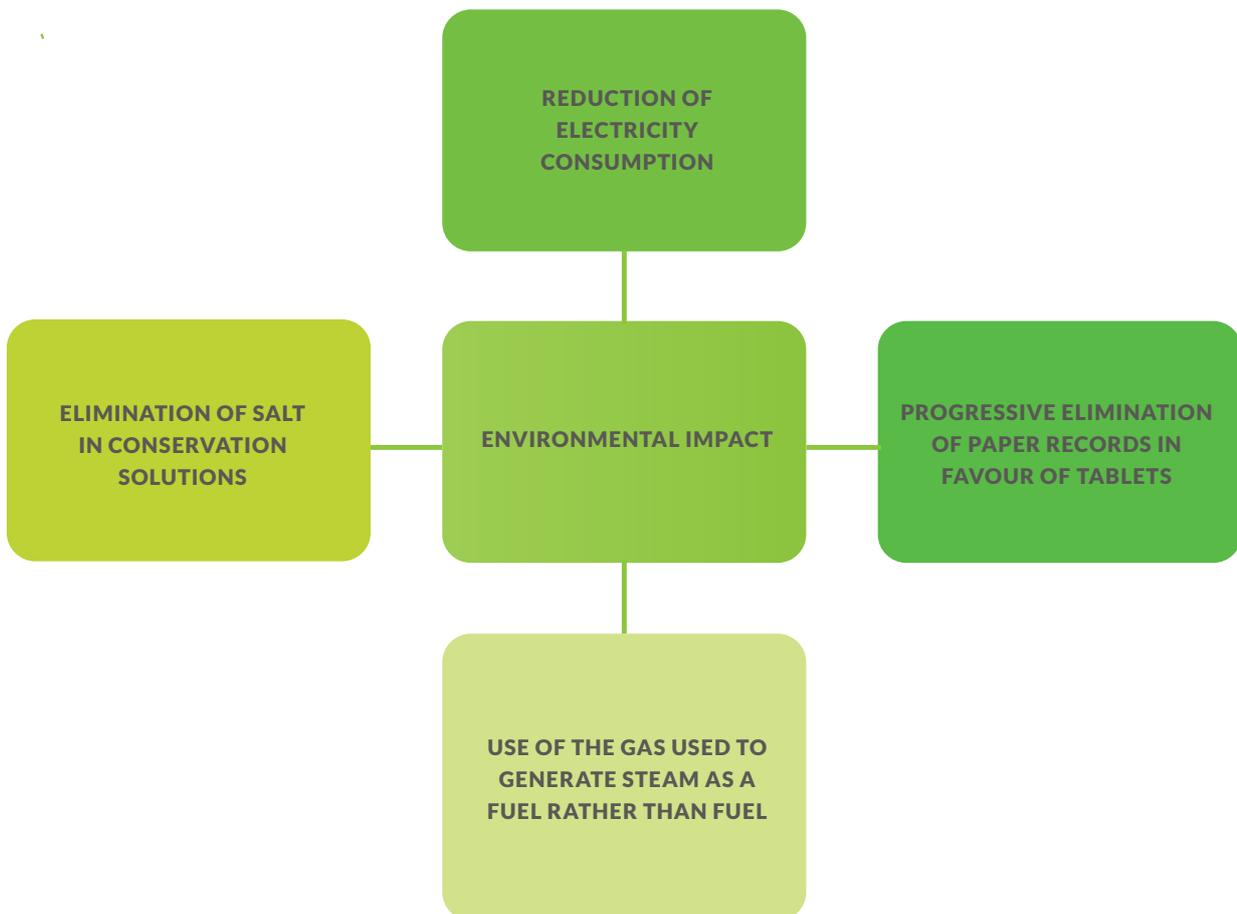
Acts of violence, threats and physical intimidation have no place in our company and can lead to disciplinary measures that may end in dismissal.

Environment

In order to achieve the satisfaction of our customers and the people who form part of the com-

pany, while at the same time complying with the commitments the company has taken on with regard to the environment, Aceitunas Torrent has developed a Quality Policy that covers food safety, the environment and the prevention of occupational risks.

One of the main cornerstones of this policy is the adoption of the necessary measures to protect the environment. We have made a commitment to mitigate and adapt to climate change, preventing and reducing the impact on the environment caused by our business activities and those of our suppliers and subcontractors.



We have also made a commitment to establishing the sustainable use of natural resources and encouraging their efficient use. To do so, Aceitunas Torrent is committed to:

- Maintaining a healthy environment, minimizing as far as possible any impacts, making appropriate use of our natural resources, controlling pollution, and efficiently managing waste and the lifecycle of products.
- Controlling water and air pollution and the production of solid waste, conserving and saving energy and other resources, and minimizing the adverse effects caused by

different actions are among the responsibilities demanded of the company.

As a consequence, each of us must also adhere to environmental laws and ensure that our actions and operational practices do not adversely affect the environment or the communities in which we operate.

As a result of this commitment to the environment, Aceitunas Torrent has drawn up various priority lines of work while at the same time adhering to the precepts of the United Nations Global Compact to promote ethical and responsible conduct in business activities within the framework of sustainable development.



6. NONCOMPLIANCE REPORTING SYSTEM

All the principles and values that make up our Code of Ethics must be observed as compulsory regulations as they form part of the essence of Aceitunas Torrent.

The responsibility of overseeing observance with this Code of Ethics, as well as that of resolving any doubts or incidents related to the interpretation of this document and proposing measures to improve or update it, correspond to the Compliance Officer as an instrument of the company, who is also charged with supervising the regulatory compliance programme implemented by the Organization to prevent criminal risks.

The Compliance Officer may act on his or her own initiative or at the request of any of the recipients of this Code of Ethics, his or her decisions being binding upon the Organization and the affected party/ies.

In exercising his or her functions, the Compliance Officer may request the support of a Committee made up of members of the Organization itself, to be appointed in each case. Likewise, if he or she deems it necessary, the Compliance Officer may seek the support of the Organization's legal advisers.

It is the obligation of any member or employee of Aceitunas Torrent to report possible illegal or criminal practices or breaches of this Code of Ethics of which they become aware within the framework of the Organization, for which purpose they should use the noncompliance reporting system established by Aceitunas Torrent,

the mechanics of which, always observing the principle of confidentiality, must be known by the managers and employees of Aceitunas Torrent, being equally available to any interested party who needs to make use of it.

No disciplinary measures will be taken, nor will there be any discrimination against, reporting employees who activate the noncompliance reporting system, provided they are acting in good faith and without malicious intent, even if the reported facts are finally shown not to be contrary to the Code of Ethics or current legislation. Any complaints made in bad faith, in the knowledge that they are untrue or with the intention of damaging a superior or colleague, may be subject to disciplinary action by the company, without prejudice to possible criminal liability for the possible perpetration of an offence against the right to honour, or eventual civil liability action for unlawful interference in the right to honour of the accused party or parties.

Any complaint that reveals a breach of this Code of Ethics, or any other regulatory breach, or even the possible perpetration of a crime, will be subject to corrective and/or disciplinary action and, if applicable, to legal action taken by the company.



FACTORY AND OFFICES

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REGISTERED ADDRESS

Cordoba

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Portal 1-2ªA
14001 Cordoba

If you need any clarifications or have any suggestions concerning the Code of Ethics, please contact the Marketing & Communications Department:
marketing@aceitunastorrent.com

You can find more information on our website:
www.aceitunastorrent.com

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