

GRUPO

Tejedor Lázaro

SINCE 1951

GRUPO TEJEDOR LÁZARO CODE OF CONDUCT

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I. LETTER FROM THE PRESIDENT

Grupo Tejedor Lázaro was born from the shared rural roots of our parents and grandparents, specifically in Fuentepelayo (Segovia), and the entrepreneurial spirit of my dear ancestors, who began a long journey in the 1950s. Thanks to this and the efforts of all of us who work there, the Grupo has earned commercial respect and has made the quality of its products, transparency in its management, and support for its people (I say people, not just workers) the hallmarks of the brand.

In this approach we have been progressing, always with respect for the main values that are our essence; with the commitment to remain true to ourselves as individuals working toward a common goal; and to our surroundings, to which we intend to contribute all our experience in pursuit of a better society.

All of us who work in the company work inclusively, with respect and with equal opportunities, because "the soul of the company is made up of pieces of each of our souls"; all of us form one big family.

We are not a company. We are a united group of people. We want our workers, to fulfill themselves, because they are our main asset. We believe in parity, equality, non-discrimination, fostering talent... and, therefore, we reject all kinds of actions that undermine or denigrate people.

We are more committed to the environment every day, investing in our surroundings—surroundings in which we were born and of which we are proud. We are committed to business quality, honest and responsible management, and as it could not be otherwise, we commit ourselves to our future successors to leave things, at least, as our Founders left them to us.

If we have learned something over these years, and we have had our share of difficult moments, it is that the present is only built by working and managing according to our values, and with the faith and support of the people who collaborate and participate in this project.

With this perspective, we have conveyed the reality we experience every day; we publish, with complete openness, who we are, what our company philosophy is, and what criteria we use to ensure our management is transparent, legal, and, above all, highly ethical.

The experience that began with the first version of our code of conduct, which we made public in 2020 on the Dibaq Diproteg website, gives us reason to believe that fulfilling our obligations as a company and as individuals, in pursuit of transparent management, should not go unnoticed, as they add value to our approach and management style.

We identify with management because it is a projection of who we are as people.

We want everyone to know our philosophy, our project and above all our values, because the most important thing is not management, it is the confidence we have that those of us who work do so from legality, honesty and the hope of being a little better every day, with a firm Purpose: We feel that authenticity inspires our life and we are excited to share this legacy with the world.

For all the reasons mentioned above, it is with great pleasure that I present this second version of the code of conduct for GRUPO TEJEDOR LAZARO as a whole. This document is the result of the many years of experience we have accumulated and, once again, the participation of all the departments of the Group, for which I would like to express my sincere gratitude.

For this reason, we state that the Code we are presenting serves as our code of conduct as a company and as a Grupo, and we share it with all users of our website, making it available to them.

We are what we write, and our daily behavior reflects what we publish.



Carlos Tejedor Lázaro

Executive President of Grupo Tejedor Lázaro

II. WHY DO WE HAVE A NEW VERSION OF OUR CODE OF CONDUCT?

The experience of these years, along with the love and passion for our work, led us to create our first version of the code of conduct at the end of 2020. Although it was initially for Dibaq Group, it is also true that it applied to all the companies in the group. We developed it after a detailed analysis of all the job positions in our companies. This process led us to design our criminal offence prevention plan.

After these years and with the experience acquired, we want to take one more step and therefore we reinforce our commitment by improving the previous version and stating that it is applicable to all companies linked to GRUPO TEJEDOR LAZARO.

The General Code of Conduct is a tool that helps us bring our business culture to life and guides us on how we should act and behave towards anyone we encounter in our work or professional environment.

Honesty, ethics, and compliance with the law are everyone's responsibility, and they are the foundation of our company to ensure a safe environment for everyone.

For all these reasons, every worker must comply with both external regulations and our work protocols, and report any irregularity that we detect so it can be corrected, sanctions imposed if necessary, and lessons learned from our mistakes, helping to make Grupo Tejedor Lázaro a reputable, honest, and world-renowned company.

III. FIRST OF ALL, THE REASON FOR OUR EXISTENCE

Our story begins in Fuentepelayo, Segovia, a rural and healthy setting that in the 1950s inspired the Tejedor Lázaro Family to embark on a long journey and an extensive professional career yet to be completed, which



over the years has forged the Group it is today. Dibaq is a company that is part of Grupo Tejedor Lázaro—a name recognized worldwide for its commitment to consumer confidence, quality assurance in our products and services, respect for the environment, and the nutrition, health, and welfare of animals that grow **with our food and our feeding programs; that is, and has been, our ethical commitment to society in general** and to our customers in particular.

Our business development has been parallel to our human growth; we have always respected the law, our values, and our ancestors' way of life and work.

Our mission is to develop the best solutions in nutrition and services for the health and well-being of companion animals and aquaculture, providing comprehensive value to our customers, whom we support at all times.

Grupo Tejedor Lázaro is synonymous with transparency, honesty, respect for values and the culture of ethics, and with the quality of our products.

We continue to make our motto "COMPROMISO Y PASION" a reality

IV. OUR VALUES

To achieve our goal of becoming a global benchmark in the field of nutrition and services for the health and welfare of companion animals and aquaculture, we are guided by values and beliefs strongly shared by our entire team, which are:

- Origin,
- Family,
- Effort,
- Humour,
- Sustainability.

These are the pillars on which the company was founded and which constitute our essence in our daily actions.



We are a company that bases our business project on respect for legality, transparency, and the people who are the foundation of our professional growth.

WHAT IS OUR PROJECT FOR THE FUTURE?

That is why we state that our project is to transmit our knowledge and train the new generations, because we are aware that the company does not belong to us. It is a "living" being that must be cared for, because our well-being as workers depends on the company's health.

Effort and hard work, together with our stakeholders, are the foundations on which we build our project to collaborate in creating a better world for pets and aquaculture.

We have chosen to continue researching, developing, and innovating in techniques, processes, and products to fulfil our mission. At the same time, we never lose sight of our team's happiness and our care for the environment—this is the path we have chosen to achieve our goals.

All this with respect for the law, our internal regulations, and our business values, aimed at creating a workplace and business environment that fosters economic and human development.

WHAT IS OUR MISSION?

We are a third-generation family group with more than 70 years of experience in the animal nutrition, health, and welfare sector.

This team of almost 450 people, present in more than 70 countries, provides global services tailored to the needs of each client.

Our strategy of geographical diversification, with presence on five continents, and our differentiation policy make us proud to say that our personal brand reflects: Trust-Transparency-Consistency-Honesty-Security are key elements in all our actions, with the aim of achieving the objectives we set.

We have brought together talent, experience, and enthusiasm, which is why we consider ourselves a dynamic group of highly qualified professionals. All our work is endorsed by the best professionals and is backed by several accreditations that are highly recognized nationally and internationally.



We seek to improve every day and are committed to the future through extensive work in research, innovation, and technology, to which we devote our greatest efforts.

We can affirm that the process and the traceability of the life of each of our products are managed to provide our customers with the most advanced and personalized solutions, and all of this is driven by our commitment to the well-being of our workers

We defend and live business honesty and transparency as a way of being and working, and we expand it to all areas in which we operate.

OUR WAY OF BEING: CORPORATE VALUES

The companies that are part of Grupo Tejedor Lázaro lay the foundations of their daily work on their ethical principles, which are firmly established and shared by the people who are part of the organization. We truly believe that one of the determining factors in achieving success is our company culture, and we are convinced that this can only be achieved through a culture of respect for the law, where transparent management is an essential element.

V. OUR COMMITMENTS -

❖ OUR COMMITMENT TO LEGALITY AND TRANSPARENCY

We are a group that has made legality the foundation of its business; we fulfill our obligations to our workers, our suppliers, and, of course, the countless regulatory standards governing our business activity.

The philosophy of transparency has always been with us, which is why we reject the discredit and damage that a legal breach can cause us.

At Grupo Tejedor Lázaro, every stakeholder is important; we believe that not only shareholders should be participants in our business evolution, which is why we have developed various channels and tools for communication and participation with all of them, ensuring that they have adequate channels to be served.

At Grupo Tejedor Lázaro in general, transparency is promoted by providing information to stakeholders, adopting responsible communication practices at all times, and communicating with them based on the "4Hs" (humility, humanity, honesty, and humor).

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All departments have established protocols for their procedures, so that any error, imprudence or negligence can prevent the commission of any crime or practices contrary to the law.

We state that all our policies promote respect for people and their rights. Respect for legality and good practices, avoiding any action aimed at bribery; money of unknown or dubious origin; endangering heritage or the environment; or actions that threaten individuals' privacy, dignity, or trust in our products.

❖ OUR COMMITMENT TO PEOPLE

For the companies that are part of the Grupo Tejedor Lázaro, the people who make it up are the main driving force of our activity. We believe **that the essence is** found in our team, and we consider it necessary to promote their development as a differentiating value of our activity.

We have called the department in charge of its management for many years now, "**People Management Department**", today Corporate People, because we believe that, above all, we are people with abilities, resources, and diverse backgrounds that allow us to complement each other and contribute the best of each one of us.

We have developed, within our internal regulations, **objective procedures for selection, remuneration and promotion that aim to give value to the person and develop their potential in all areas based on objective criteria**, where merit and ability are the only reason for their incorporation and permanence.

Our concern for our newcomer colleagues is reflected in the fact that they receive a "Welcome Manual", now called On/Off Boarding, which will be updated to its third version in 2025.

That is why we dedicate a lot of effort to creating an excellent work environment, fundamentally based on understanding, autonomy, and motivation, which, with the perspective of experience and time, is proving very positive for all parties—and this positive atmosphere is even felt by the end consumer.

Similarly, we are committed to retaining and increasing people's talent, and to achieve this, we believe that providing adequate feedback is necessary.

In order to facilitate harmony between the personal, family, and professional lives of everyone in the business group, and in the ongoing pursuit of well-being and happiness, we have prepared our own guide to voluntary work-life balance measures, which are adapted every year.

The **Protocol of Action against Harassment**, currently in its second version, was a document where the Grupo's commitment to avoid any attempt at conduct that causes pain to people was expressed. At the same time as its implementation, the I **Equality Plan**, was launched, which gave rise to the Equality Committee, which has been in place for some time and whose contributions have helped to develop the II Equality Plan.

In the same way, the LGTBI+ protocol is another step towards making that reality.

Measures that show that, for Grupo Tejedor Lázaro, people—not just human resources—are what matter most.

We see the person as a whole, whom we care for and aim to help develop both personally and professionally in a healthy environment, where legality and company values are essential elements.

❖ OUR COMMITMENT TO THE ENVIRONMENT.

Our concern for people was translated into a code of good practices. This was later absorbed by a first code of conduct, which is now in its second version. Through this code, we have committed ourselves to respect one another and to grow in a responsible and sustainable way, without forgetting our environment and the people who live in it. This commitment has led us to become involved in the social, cultural, and business development of the places where we are, taking care of people, the community, and the environment that surrounds us.

We express our constant commitment to sustainability (ESG), which is why we created the Compromiso y Pasión® Committee in 2021, which is responsible for instilling the Group's values and all aspects of corporate social responsibility. Our Third Sustainability Report has been certified and verified, in collaboration with the United Nations Global Compact and the 2030 Agenda.

❖ OUR COMMITMENT TO QUALITY.

Since our founding in the 1950s, quality has always been an essential element of our products.

We take care of every detail from the origin to the final consumer and we state that the traceability of all our products is serious, real, and accredited by certifications such as IFS FOOD, BAP, and GLOBAL GAP—clear evidence that our production processes and results are carried out in compliance with strict legal and business standards.

For this reason, the policy developed by Grupo Tejedor Lázaro, in terms of quality and environment, is based on the premise that, by pursuing quality, respect and honesty, we will achieve the competitiveness that ensures our survival over the years and that work is carried out in an adequate, proper and safe environment.

QUALITY IS A GUARANTEE FOR THE CONSUMER, which is why it is forbidden to reduce the quality, and the various audits make this clear.

❖ OUR COMMITMENT TO CONTINUOUS IMPROVEMENT IN R&D&I

Grupo Tejedor Lázaro wants to continue growing in the future, as it has in the past, by offering new products that improve the quality of life of our pets, which is why we prioritize research and development.

VI. THE PURPOSE OF THE CODE OF CONDUCT

The Code of Conduct of Grupo Tejedor Lázaro aims to develop, formalize, implement and publicize the values of its companies. It is an internal rule that must be followed by everyone who works in the Group.

We must work with: ethics, responsibility, commitment, absolute respect for legislation and our environment, and a commitment to continuous improvement.

Our relationships are based on personal values, which have been promoted by the different companies of the Group since their creation—the same values that we uphold, expect from our colleagues, and demonstrate publicly.

That is why we affirm that in our daily work, effort, sustainability, respect for family life and good humor are the intangible elements that accompany our human and professional integrity, where absolute compliance with the law is an element that does not admit discussion.

With this document, we aim to clearly express Grupo Tejedor Lázaro's commitment to legislation and business ethics, encouraging decisions and business practices that are consistent with the principles of legality and respect for individuals and consumers.

Compliance with the Code of Conduct applies to all individuals and companies that make up Grupo Tejedor Lázaro, and sets out in writing the commitment of the shareholders and Board members to ensure that all companies in the Group act at all times in accordance with current legislation, with the sole purpose of promoting ethical and legal standards in the conduct of daily professional activities.

The Code of Conduct is, therefore, applicable not only to the members of all the companies of Grupo Tejedor Lázaro and to all our suppliers and collaborators, whom we will inform about it and ask to adhere to it,

VII. OUR PRINCIPLES OF CONDUCT

❖ REAL AND DAILY COMMITMENT TO THE LAW, ETHICS, AND OUR VALUES IN ALL OUR AREAS OF ACTIVITY

The different companies that make up Grupo Tejedor Lázaro aim to ensure that our activity is carried out in accordance with the law, our corporate values, thus guaranteeing the responsible operation of all the companies in the Group.

In order to embody our values in all areas of our activity, it is essential that we are people with high moral standards. In this way, and by acting in accordance with the provisions that make up our Code, the company's management assumes the commitment to adopt the appropriate measures aimed at ensuring that the values are genuine and effective, and to ensure that legality permeates each of the areas of our daily work.

We state that all the action protocols by which the different departments are governed demonstrate that legality, transparency, and good practices are the gene of our daily actions.

The performance of any action that could be considered a crime under Spanish criminal law will carry with it the corresponding sanction for disobedience to this principle of utmost respect for the law.

We will not obstruct any activity of the administration and we will facilitate any verification activity that is carried out in order to establish the legality of our management.

We proclaim the following as guiding principles of our daily actions:

❖ THE IMPLEMENTATION OF A POLICY AIMED AT PREVENTING THE COMMISSION OF CRIMINAL OFFENSES.

In 2019, Grupo Tejedor Lázaro decided to adopt a Criminal Offence Prevention Plan (Compliance), which, over successive phases, has implemented management policies to detect and prevent acts that violate current laws and our own internal regulations.

All conduct contrary to legislation, both national and international, as well as to our internal rules, is prohibited in this Business Group, whose management bodies are committed to using all necessary means to ensure that these measures are effectively and genuinely implemented.

If actions contrary to this Code of Conduct of our company could also constitute a potential violation of current regulations, we will act in accordance with current legislation, bringing it to the attention of the competent authorities and actively collaborating in the investigation and clarification of the facts.

Legality, respect for values and people are the pillars on which we have grown and the inherent philosophy of our business group.

❖ THE CONCERN FOR AN INCLUSIVE AND NON-DISCRIMINATORY WORK ENVIRONMENT

We are a group in continuous evolution, we adapt quickly to new demands, and we believe that everyone has a place in an open and tolerant society. That is why we oppose all practices that involve discrimination or are not inclusive. People from diverse backgrounds, people with disabilities, and people who identify as LGTBI+ must be able to develop professionally in a work environment where equality and respect for all are fundamental.

❖ DIGNITY, INTIMACY AND CARE FOR PEOPLE AS KEY ELEMENTS OF WHO WE ARE AS A COMPANY

Grupo Tejedor Lázaro considers the right to human dignity and the privacy of all its workers and collaborators. Their physical and emotional security, as well as respect for their privacy, are fundamental elements. Therefore, the Group will strengthen all measures to ensure this, including those related to personal data.

All workers will work at all times in legal conditions, and we will make respect for labor and social rights a fundamental principle of our daily activities.

Access to the personal data of all members of Grupo Tejedor Lázaro is limited to the staff of the Corporate Persons department who have the obligation to ensure the confidentiality of said information, complying at all times with the obligations set out in the regulations on the protection of personal data.

The information systems management area develops and implements the necessary processes to ensure that only those who are authorized can access confidential data.

The workers of Grupo Tejedor Lázaro will not disseminate defamatory comments under any circumstances, nor will they use language, images or files that are offensive or that induce any form of discrimination, or that violate the dignity of any of its employees.

Failure to comply with this rule will result in the corresponding sanction for disobedience.

Grupo Tejedor Lázaro aims to promote and encourage professional development opportunities for its employees, in line with their abilities and professional aspirations, as well as to recognize and reward their performance and involvement according to objective and fair criteria. The company has a "Procedure for hiring, recruitment, selection, and onboarding of personnel," which is continuously improved to adapt to new realities.

In 2024, we implemented the digital disconnection protocol to adapt to the new regulatory requirements and facilitate our colleagues' right to rest.

At the same time, as a means of ensuring a safer environment, we have proceeded to install video surveillance cameras, thus contributing to a safer and more appropriate environment

❖ PROHIBITION OF VERBAL AND PHYSICAL HARASSMENT.

Assuming the commitment to create a dignified workplace, in 2017 we developed and implemented a HARASSMENT PROTOCOL, which is currently in its second version and prohibits any form of verbal or physical harassment, or abuse of authority, that creates fear or hostility in the workplace.

Behavior or insinuations of a sexual nature or verbal or physical conduct based on race or gender are unacceptable to the Group, and are sanctioned in accordance with the provisions of our sanctioning protocol.

For this reason, all acts of harassment and violence, physical or mental, are intolerable and are completely prohibited between the company's employees or with any person belonging to an entity with which the companies of Grupo Tejedor Lázaro maintain commercial relations. These acts will be appropriately sanctioned in accordance with the regulations if there is sufficient justifying cause.

Aggressive attitudes involving insults, threats or undesirable behavior that refer to race, gender, age, religion, nationality or physical disability, are strictly prohibited.

❖ OCCUPATIONAL HEALTH AND SAFETY AS AN ESSENTIAL ELEMENT

Grupo Tejedor Lázaro has been developing a policy for the protection of safety and health at work, in accordance with the Occupational Risk Prevention Act. The right of workers to a safe and healthy working environment must be articulated through the integration of occupational health and safety, at all levels of the company. For this purpose, we have an external prevention service that will be responsible for managing prevention in our workplaces.

In the spirit of creating a healthier environment, the Group does not allow the consumption of tobacco, alcoholic beverages or other drugs, nor being under the influence of these during working hours.

❖ PROMOTION OF EQUALITY

At Grupo Tejedor Lázaro we are aware that our strategic management has to be in line with the needs and demands of society, as we consider ourselves a leading social agent in whose sphere continuous work and personal relationships are established.

For this reason, in 2017 we implemented the Gender Equality Plan, which is currently in its second version within the organization, following the guidelines set by the legislation.

The result of this plan was the implementation in the same month of the Equality Committee, a joint body where people who work in the Group and members of its management ensure its effective application.

The next step, in its own evolution, was the expansion of its functions with the new name of DIVERSITY AND CONCILIATION COMMITTEE, which was established in 2019. It currently meets on a quarterly basis.

❖ CONCERN FOR PEOPLE'S HAPPINESS

We are aware that people's happiness requires a path where working life plays an essential role, which is why at Grupo Tejedor Lázaro in general, we strive to ensure that this satisfaction is complete and we have set up a series of measures aimed at putting it into practice.

We believe that talent is only captured and retained in a healthy environment where people are an essential part of the process and not mere actors. That is why we recognize their importance and support their family life, encouraging the growth of their personal projects.

We prohibit and take action against any act of harassment, as well as any manifestation of discrimination, in its broadest sense, and we demand from ourselves as workers the utmost respect among ourselves and for all those who work in our workplace.

❖ OUR COMMITMENT TO THE PROFESSIONAL DEVELOPMENT OF THE PEOPLE WHO WORK IN THE COMPANY

The well-being and development of people is a constant commitment for Grupo Tejedor Lázaro. To this end, strategic workforce planning is carried out as a tool for a joint and open process of reflection, in which the company decides today what it wants to be in the future.

Grupo Tejedor Lázaro has made a commitment to promote the development of the people who make up the company, being aware of the importance that people have for the effectiveness and survival of our company in the globalized and highly competitive environment in which we operate today.

In recent years we have been developing **our Strategic People Plan**, which is implemented through various internal procedures, in order to establish objective and fair criteria for policies on Hiring, Recruitment, Selection, and Induction, as well as the Training Plan, Professional Career Development, Variable Compensation Policy, and Work Environment Survey.

❖ TEAMWORK

At Grupo Tejedor Lázaro, we empower the creation of committed, cohesive, and motivated teams with a shared and clear vision. This approach transforms individual and group performance into team performance, where the final result is greater than the sum of the parts that make it up.

We are convinced that a positive work environment fostered by collaboration among all members leads to the personal and professional satisfaction of everyone and contributes to the achievement of business objectives. For this reason, the Group wants to make teamwork and respect for the law and our values a daily practice, and to foster an environment that encourages clear and timely communication in a healthy atmosphere.

❖ THE RECONCILIATION OF WORK AND FAMILY LIFE

Grupo Tejedor Lázaro promotes work-life balance and has been firmly committed for several years to ensuring a real equilibrium between personal and professional life by implementing a management model that makes this possible, based on flexibility, respect, and mutual commitment.

This situation was already recognized by the Junta de Castilla y León, which granted us the "OPTIMA" certificate on April 4, 2008. This certificate remains in force to this day.

The company has the EFR certificate, issued by AENOR, promoted by the Másfamilia Foundation, and endorsed by the Ministry of Health, Consumer Affairs and Social Welfare, in recognition of our real and effective management, helping to create a new work culture in society.

The EFR certificate is a seal of quality in work-life balance and equal opportunities and has been obtained after an exhaustive involvement of all of us who make up EL GRUPO.

Our concern as a company led us in 2019 to expand the objectives of the Equality Committee so that it would also address the needs of family and personal work-life balance, and we renamed it the DIVERSITY AND WORK-LIFE BALANCE COMMITTEE. Periodically, with the participation of

all levels of the company, the equality plan and the work-life balance process are thoroughly analyzed.

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❖ ENGAGEMENT WITH EXTERNAL STAKEHOLDERS

⇒ PROHIBITION OF CORRUPT BEHAVIOR

The policy of Grupo Tejedor Lázaro, in line with the principles and values of the Group, rejects and prohibits any attitude aimed at obtaining benefit from third parties through practices of favoritism such as bribes

or gifts, providing money or anything of value, directly or through third parties, to any government authority or political party, and this was approved by the Board of Directors through the implementation of the Group's **integrity policy**.

The people who make up Grupo Tejedor Lázaro will not accept personal benefits or economic compensation from any customer or supplier, or from any other natural or legal person who tries to do business with the company.

All gifts or donations received must be returned to the person who gave them, and if this is not possible, they will be delivered to the compliance manager to be raffled among all the members of the department to which the worker belongs.

Failure to comply with this rule will result in the corresponding sanction for disobedience.

⇒ TRANSPARENCY IN ECONOMIC MANAGEMENT

We are a serious company, which carries out its professional activity in various parts of the world, which scrupulously respects all legislation on tax accounting and money laundering.

We faithfully comply with our tax obligations and our obligations to our suppliers, and our management is clear and transparent, keeping our shareholders and stakeholders informed at all times.

⇒ INVOLVEMENT WITH OUR RURAL ENVIRONMENT AND RESPECT FOR THE ENVIRONMENT AS A FUNDAMENTAL ELEMENT

Beyond mere compliance with current regulations, at Grupo Tejedor Lázaro we are involved in the social and cultural development of the community to which we belong. We are a company born in Fuentepelayo, a rural town that has instilled respect for the environment in our company values. This is why we proclaim our total involvement in complying with the **regulations aimed at promoting it and developing actions** that contribute to actively improving the environmental conditions of our surroundings. We do this by preventing pollution, complying with current applicable legislation, and actively participating in campaigns aimed at promoting it.

Our work protocols have sustainability and respect for the environment as key elements guiding our actions.

⇒ HIGH-QUALITY SAFETY AS AN ESSENTIAL ELEMENT OF OUR PRODUCTS AND GUARANTEE FOR OUR CONSUMERS

We are a company that produces the products desired by our customers, through the use of sustainable raw materials and the best possible techniques, so our business development depends on the satisfaction and trust of consumers, our customers are at the heart of everything we do.

In this way, the policy developed by Grupo Tejedor Lázaro, in terms of Quality, Environment and Food Safety, as well as in R+D+i, seeks to achieve the objective of offering innovative products that meet the highest Quality standards.

We do not skimp on technical means to achieve this and, with the same purpose, we have a human and technical team that puts its soul into each phase of the process, trying to meet the expectations of our customers.

Our maxim in customer relations is responsibility and commitment, and honesty.

⇒ MARKETING TO INFORM, NEVER TO CONFUSE

Advertising is an important aspect of our business, as a communication element that allows us to publicize the utilities and advantages of our products and propagate the company's image.

We believe in honest, transparent and truthful advertising as an element that contributes to providing knowledge, prestige, reliability and rigor, but it must always be reliable and truthful.

That is why our actions will respect ethics, will not lead to any confusion and will promote the understanding of our products and their contribution to improving the quality of life of their consumers.

Our labels, publications and ultimately all our communication is a true reflection of what we do, WE DO WHAT WE SAY, and we fulfill what we say

❖ THE COMMITMENT OF THE WORKERS OF THE COMPANIES OF GRUPO TEJEDOR LAZARO

In our companies we are aware that one of the differentiating factors of our products and services is the talent of our workers, which is why we are committed to promoting the development of the people who are part of our team, although we require everyone to be involved in the project that entails the duty to comply with the commitments and practices that the company promotes.

◆ RESPECT FOR THE POLICIES AND PROTOCOLS OF EACH DEPARTMENT IN THE FIELD OF PREVENTION OF CRIMINAL OFFENCES

All employees of the different companies of the Group must be demanding in compliance with the law and be faithful to the policies that are being implemented by the company's top management at the proposal of the Regulatory Compliance Committee, with the sole purpose of contributing to improving management, detecting and preventing any illicit action or action contrary to our rules.

The protocols of each department are known by all the workers in each area and they must apply them in their daily activities and we have updated them.

◆ THE PROTECTION OF BUSINESS INFORMATION AND RESPECT FOR PRIVACY AND CONFIDENTIALITY

The Group's employees assume the commitment and obligation not to disseminate internal information of which they are aware due to their professional activity and which has been provided by the company for the performance of their work, especially when it is of a sensitive, strategic or confidential nature. For this reason, they must safeguard the interests of the organization at all times by demanding that other collaborators do the same.

It is forbidden to transmit any business information to third parties outside the companies of Grupo Tejedor Lázaro S.L., including family, friends, co-workers or other people.

Respect for personal and business privacy is a key element and any act contrary to it will be sanctioned.

For these purposes, among others, all documentation comprising commercial plans, business plans, marketing and service strategies, manufacturing ideas, product recipes, designs, databases, salary information, or any other type of financial or other information that has not been published is considered privileged information from a business perspective.

The obligation of confidentiality will persist even after the termination of the employment relationship with the companies of the Group.

◆ RELIABLE, ACCURATE AND TRUTHFUL INFORMATION

The falsification, manipulation or deliberate use of false information is prohibited.

We state that it is the responsibility of all the people who work in the Group's companies to guarantee reliability, accuracy, integrity and updating of the data that is incorporated into the different types of records, physical or logical, that are handled and of the information produced during the development of their tasks.

Each person is responsible for the veracity of the information they provide and the documents they issue and circulate, as well as for the proper custody and conservation of the information that has been collected in the company's systems and files.

The company's economic and financial information must faithfully reflect the actual situation. To this end, the group companies that are required to do so carry out an external audit annually and in no case will inaccurate information be knowingly provided, nor will an audit be delayed or prevented by hiding, manipulating or destroying information.

It is the obligation of all employees to cooperate with the greatest diligence with the Group's internal supervisory bodies, with the external auditors and with official bodies, as well as with any third party designated by the company.

◆ RESPECT FOR THE PROPERTY OF OTHERS AND RESPECT FOR THE INTELLECTUAL PROPERTY OF OTHERS

The use of work equipment for illicit or illegal purposes is prohibited. The work equipment supplied by the companies of the Group, including Internet, software, facilities, and other corporate elements, must be used solely to carry out the company's work activities, and is prohibited for personal use or for one's own purposes, except by express and written exception from the highest authority of the company.

The use of business elements for private purposes is prohibited, unless written authorization is given by the head of the department.

Each of the members of the Group's companies is responsible for the use, care, maintenance and protection of these.

The publication, reproduction or exploitation of any information, pirated material or pirated software that may infringe intellectual property rights is prohibited.

Communications made through the computer tools must not contain offensive statements or illegal information, in an abusive, sexist, obscene, racist manner, or of any kind that may be defamatory to anyone.

Electronic messages that are produced using the company's technology can be attributed to the companies of the Group and, therefore, special vigilance must be exercised in what is communicated and how it is done and the use of the company's mail for personal communications should be avoided.

Passwords are for individual use and their shared use is prohibited, and they must follow the Management Protocol of the Group's Information Systems Department.

◆ ON SOCIAL NETWORKS. PARTICIPATION IS INDIVIDUAL

The participation of workers in social networks, forums or Internet blogs will be carried out in such a way that the personal and individual nature of the author is clear, except in those cases of express authorization by the company.

In any case, employees are prohibited from using the image, name or brand of any of their Group companies.

◆ NO USE OF THE INTELLECTUAL PROPERTY OF THE GROUP COMPANIES

Intellectual property rights, which cover all knowledge developed in the work environment, including trademarks, logos and any other distinctive signs, computer programs, patents, utility models, systems, industrial processes, methodologies, product recipes, designs and any other elaborations, belong to the company, which will develop and exploit them, in accordance with the national legislation in force, without prejudice to respect for the rights of the inventor or author in accordance with such legislation.

In any case, employees are prohibited from using any element that is the intellectual property of the Group.

◆ PROPER USE OF THE CORPORATE IMAGE AND THE COMPANY'S RESOURCES

It is forbidden to use the image, name or brand of any of the companies of the Group in an individual capacity.

All employees must take care of the company's image, and ensure the use made by suppliers and collaborating companies.

The companies of Grupo Tejedor Lázaro make available to their employees all the resources necessary for their professional performance and undertake to provide the necessary means for their protection and safeguarding.

Employees will not use these resources for personal use and/or performance of activities unrelated to their professional activity.

The use of these means must conform to the principles of purpose, necessity, austerity and conservation. Goods are economic, physical, technological resources or those related to the brand, information or working time.

◆ PROHIBITION OF CONFLICTS OF INTEREST.

The "Conflict of Interest" arises when the personal interests of employees or their closest environment, directly or indirectly, are contrary to or come into conflict with the interests of the company or interfere with the fulfillment of their work obligations; therefore, employees of any of the Group's companies will not, under any circumstances, seek personal benefit or benefit for family members through the improper use of their position in the company.

Employees who have family members in potentially supplier companies will refrain from participating in the award processes, unless they have express authorization from the Management.

The workers of the companies of Grupo Tejedor Lázaro must avoid any situation that causes a possible conflict of interest and if it could occur, they will notify the Compliance Committee, so that it can decide on the procedure to be followed.

Workers of the companies of Grupo Tejedor Lázaro may not carry out parallel professional activities outside the company that may interfere with the fulfilment of these obligations.

◆ PROHIBITION OF ACCEPTING AND OFFERING GIFTS, PRESENTS AND HOSPITALITY, BRIBES, ILLEGAL COMMISSIONS AND INFLUENCE PEDDLING.

It is forbidden for all persons linked to Grupo Tejedor Lázaro by reason of the position they hold, to accept gifts, attention, services or any other kind of favor from any person or entity, which may affect their objectivity or influence a commercial, professional or administrative relationship.

Likewise, all types of activities aimed at carrying out corrupt practices are strictly prohibited, including, by way of example, bribery, illegal commissions and influence peddling.

It is mandatory for all workers of Grupo Tejedor Lázaro to follow the integrity policy of the same.

◆ PROHIBITION OF CASH PAYMENTS AND ATTENTION TO MONEY LAUNDERING.

It is forbidden to accept money from customers or to deliver payments to suppliers in cash with amounts over 1,000 euros and up to 10,000 euros when the parties involved are residents abroad, and can do so through a business transaction.

In order to prevent and avoid money laundering, the Group's employees will pay particular attention to situations where there may be indications of such events, for example:

- Cash payments, check payments or payments made in a foreign currency, which are unusual or unforeseen in normal operations.
- Payments made without the support of an invoice or contract that are not duly authorized.

- Extraordinary payments not provided for in the contracts or payments processed urgently without being authorized and without the supporting document.
- Issue invoices in the name of companies when the service has been provided to an individual.
- Issuing invoices with items that do not correspond to what is actually provided. For example, billing a company as a convention for a communion service.

If it is suspected that a customer may be involved in any irregular operation, it must be reported immediately to the Group Management by means of an email sent to the whistleblowing channel <https://grupotejedorlazarro.com/canal-de-denuncias/>

VIII. GOOD PRACTICES WITH OUR CUSTOMERS, SUPPLIERS, SHAREHOLDERS AND COLLABORATORS

Grupo Tejedor Lázaro establishes commercial relations with various countries, currently reaching more than 80 countries, in a market that is rapidly expanding and with a quality policy that ensures a very favorable reception, including among its customers both EU countries and non-EU countries.

❖ GOOD PRACTICES WITH CUSTOMERS.

Customers are a fundamental element in the development of the Group's business activity, as they are the ones who allow us to reach consumers.

Our customers are our reason for being, so their satisfaction is our success. Our high degree of commitment is based on offering differentiated products and services, based on high quality standards based on excellence.

Our maxim in customer relations is HONESTY, responsibility and commitment, so there is no bribery or favoritism, nor will we carry out activities contrary to good customs.

As part of our commitment to client satisfaction and quality of service, at Grupo Tejedor Lázaro we accredit our quality with various certifications: IFS FOOD, BAP and GLOBAL GAP certifications, which we renew annually.

❖ GOOD PRACTICES WITH SUPPLIERS.

The companies that form Grupo Tejedor Lázaro base their relationships with our suppliers on respect, non-discrimination, equal opportunities, and honesty with the commitment to carry out transparent negotiations, away from any type of discrimination and/or imposition. In the same way, we protect the confidentiality of the information provided by suppliers.

We promote a framework of collaboration, transparency, trust, respect and benefit for the parties, which allows and facilitates the achievement of mutual objectives.

Suppliers will be chosen according to criteria of objectivity and impartiality and will avoid any conflict of interest or arbitrariness in their selection.

Our policy with third parties includes, at all times, the respect of trade secrets or other information of exclusive ownership of the same, except with the express consent of the interested parties, or in the event of a judicial or administrative requirement and always under the protection of current legislation.

All suppliers of the companies of Grupo Tejedor Lázaro must exhaustively comply with their legal and contractual obligations and respect our code of conduct of which they will be made a participant and will be required to adhere to it.

Therefore, within twelve months of the publication of the code, we will send the link to it to all our suppliers.

For more details on the supplier code of conduct, [click here](#).

❖ GOOD PRACTICES WITH SHAREHOLDERS

Grupo Tejedor Lázaro will promote awareness of this code of conduct among all shareholders of the companies that are part of the Group.

The members of the Board of Directors of the different companies. They undertake to provide the appropriate information to the shareholder, in a transparent and homogeneous manner. The company has developed a crime prevention model by which it assesses and analyses criminal risks and their controls.

❖ GOOD PRACTICES WITH COLLABORATORS

The team synergies created with our collaborators are based on respect, honesty and professionalism, seeking in turn a mutual commitment that enhances growth and development on both sides.

All employees of the different companies of Grupo Tejedor Lázaro have the obligation to know and understand the guidelines of our policy and commitment both to this code of conduct and to our Corporate Social Responsibility policy, where our "COMPROMISO Y PASIÓN" Committee guides our actions,

We invite all our collaborators to the NEWSLETTER, sent from the email address rsc@grupotejedorlazarro.com

IX. THE NEW WHISTLEBLOWING CHANNEL

In 2023, we adapted to the new legislation and left behind the experience of our first whistleblowing channel, which was based on the email that appeared on the website of the company Dibaq, since 2020 and which had a link directed to canal.dibaq@abogadosnegotia.es

The obligations imposed by law 2/2023, of 20 February, regulating the protection of people who report regulatory breaches and the fight against corruption, made it necessary to adapt to the new regulatory

framework and therefore we added a link to the new "complaints channel" model on the websites of the different companies in the group.

The new Channel is our internal information system, designed to help people express themselves and speak clearly, in order to strengthen the culture of information, transparency and compliance with the law within Grupo Tejedor Lázaro.

It is hosted on a platform that can be accessed via the web <https://grupotejedorlazarro.com/canal-de-denuncias/>, where complaints can be made in writing or orally, and are recorded in the aforementioned platform.

In addition, there are other options such as:

- Send a letter to the address: C/ Peña Herbosa 22, 1º pl39003 Santander. Cantabria. Spain
- Request a face-to-face meeting that will be attended within a maximum period of seven days, via the company's communication channels.

These communication channels are operational 24 hours a day, seven days a week, and it is an external company that receives the communications to guarantee your confidentiality and anonymity

Through the Channel, you can report suspicions about conduct that takes place in the professional or work environment related to:

- possible suspicions of a criminal offence,
- possible breaches of the Code of Conduct,
- possible breaches of external and internal regulations
- financial and accounting irregularities,
- serious or very serious criminal or administrative offences or an infringement of European Union law;
- any breach of our work or conduct protocols.

The communications are transferred, confidentially (and if you want also anonymously) to our external company so that they can study them and act accordingly.

Any professional of the Group companies, supplier, client, shareholder or third party who is related to us, can access the Channel.

Retaliation or threat of retaliation for having made a communication is prohibited. This prohibition shall not prevent us from taking disciplinary

actions where the internal investigation determines that the communication has been malicious and/or made in bad faith.

You have at your disposal the Information System Policy and the Channel Management Procedure to learn more about the management criteria and principles that regulate our channel.

X. IMPLEMENTATION OF THE CODE OF CONDUCT

It is the responsibility of the Group's Board of Directors, as the highest Governing Body, to promote compliance with the policies and practices expressed in this Code of Conduct.

Likewise, it is the responsibility of the management bodies, such as Senior Management, to adopt measures aimed at communicating and disseminating the content of this Code among their employees and will ensure that all employees who join have access to it.

All employees of the companies of Grupo Tejedor Lázaro are subject to compliance with the following obligations:

1. Know the Code of Conduct and proceed in accordance with its contents, with absolute respect for the law,
2. To promote among collaborating companies and suppliers the values and practices contemplated in this Code.
3. To report, in a responsible manner, any indication of the existence of conduct that contravenes the provisions of this Code in accordance with the procedure provided for in the Whistleblowing Channel.

For the correct dissemination, management and monitoring of the Code of Conduct, a Compliance Council has been established, made up of all the members of the Group's Board of Directors, which is ultimately responsible for complying with it.

The Group's Compliance Committee is an assistance, control and supervision body in charge of its application. Since 2019, the body is made up of the heads of the different areas of the Group's companies, whose main function is to ensure the correct application of the Criminal Offence Prevention Compliance Program.

In the event of discrepancies between local laws and regulations and this Code, Group companies shall preferably apply the strictest standard.

No one, regardless of position in the Group, may authorize an action contrary to the provisions of this Code, and even less contrary to any applicable legal provision.

No member of the Group companies may justify conduct contrary to the values and standards of Grupo Tejedor Lázaro by claiming they were following a superior's order or were unaware of the Group's Code of Conduct.

XI. APPLICATION OF NON-COMPLIANCE AND COMPLAINT PROCEDURE

To make compliance with the Code of Conduct more effective, a whistleblowing channel, <https://grupotejedorlazarro.com/canal-de-denuncias/>, has been established in line with the 2023 legislation, to allow the company's employees to report, in a completely confidential manner, without fear of reprisals, any breach of the principles set out in this Code.

The purpose of this channel is to contribute to making the application of all the regulations of the Group's companies more effective, by informing the company of irregular conduct that violates said regulations, avoiding any act of repression and guaranteeing the confidentiality of the complaints filed.

If any worker during the performance of his/her professional activity, witnesses any breach of the regulations, he/she must report it immediately.

To do this, the worker must enter the platform or contact his/her manager directly (if possible), to let them know as soon as possible,

The complaints procedure will fully respect the current legal framework and the fundamental rights of the persons who may be affected, and will allow any employee who has become aware of a violation to bring this circumstance to the attention of the Regulatory Compliance Committee.

The company will protect the anonymity of any individual who, in good faith, raises legitimate concerns regarding compliance with this Code, and will ensure the confidentiality of the entire process.

All persons who report an incident will be treated with all respect and dignity. However, malicious or bad faith reports will be sanctioned to avoid the possible abuse of this system of complaints.

The Group will ensure that complaints are channeled as a matter of priority through this procedure. However, if notice of the possible infringement arrives through other channels, the Group may act ex officio in accordance with the provisions of these regulations.

XII. VALIDITY OF THE CODE OF CONDUCT

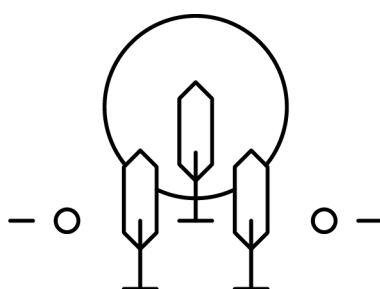
This second version of the Code has been approved by the Board of Directors (Office of the Presidency) of Grupo Tejedor Lázaro S.A., agreeing on April 1, 2025 as the date of its entry into force.

The Code will be reviewed and updated at the intervals indicated by the Board of Directors, or the Office of the Group Chairman, or proposed by the Regulatory Compliance Committee and in any case every three years from its entry into operation.

DATE	DESCRIPTION
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12/2020	Implementation vr.1 Code of Conduct
01/04/2025	Version 2 Code of Conduct



GRUPO

Tejedor Lázaro

DESDE 1951



SINCE