




CODE OF ETHICS

OLIVITE EXPORT S.L.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 2 de 22

PREAMBLE


OLIVITE EXPORT, SL is a company specialized in the export of olive oil worldwide. Our project began with the merger of the experience of the family company Juan Ballester Roses Sucesores, with over 150 years in the olive oil sector, and five cooperatives from the Terres de l'Ebre with over a century of history. As an entity formed by cooperative capital, we define ourselves as an organization of people based on values, which inspire the principles and rules of our cooperative partner companies, which are part of our identity. We are based on values such as individual and collective responsibility, democracy, equality, fairness, and solidarity, and cooperative members embrace the ethical values of honesty, transparency, responsibility, and social commitment.

OLIVITE EXPORT, SL aims to establish in this code the ethical behavior norms that should guide us in decision-making, both in internal governance tasks (corporate bodies, management and executive bodies, member individuals) and in relations with our stakeholders (workers, clients, suppliers, administration, and society in general).

This code defines for us what ethical behavior is. In other words, it defines what we aspire to be collectively as a company and what is expected of us as individuals who are part of the market. Therefore, it constitutes a tool that should facilitate the achievement of our objective for the members of our entity, consistently with our values and principles.

It is important to bear in mind that a breach of the values, principles, or rules of our Code of Ethics may entail not only legal responsibilities, whether individual or for the entity itself, but may also affect the reputation of the company, which is why compliance by all those involved in the organization is essential.

The Board of Directors has unanimously agreed to approve this Code of Ethics as a starting point for the implementation of the mechanisms offered by the legal system to fulfill the ethical, social, and legal commitment to compliance.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 3 de 22

The Board of Directors.

Title I. THE CODE OF ETHICS AS AN OBJECT OF COMPLIANCE

Art. 1.- Legal nature

In accordance with our Articles of Association, OLIVITE EXPORT, SL is subject to Royal Legislative Decree 1/2010, of July 2, which approves the consolidated text of the Capital Companies Law.


The Code of Ethics is agreed upon and approved in a meeting of the Board of Directors, in accordance with the Articles of Association, and therefore constitutes a regulatory instrument that must be complied with, both internally and in relations with third parties, aiming to establish the basic guidelines for corporate conduct.

Art. 2.- Concept of Code of Ethics and company mission

This Code of Ethics provides the rules that should guide the behavior of its recipients and the criteria for action in the development of our corporate purpose. The objective is to integrate this code into the backbone of the entity and its members. It is a fundamental element of our corporate culture to achieve the mission of our company, which, as a capital society, is the development of activities and commercial operations aimed at the best use of capital, in this case cooperative, and indirectly of the operations of the members of our cooperative partner entities, as well as the improvement of the agricultural population and rural development to which they are connected.

Art. 3.- Recipients and obligated subjects

The recipients of this Code of Ethics are all those subjects (hereinafter also "members")

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 4 de 22

who are part of the environment of OLIVITE EXPORT, SL:

- Members of the company.
- Board of Directors.
- Management and executive bodies.
- Workers.
- Other stakeholders.

In particular, all members of the Board of Directors and the management and executive bodies have special responsibility, as they are both obliged to comply with and responsible for ensuring compliance with the mandates contained in this Code of Ethics, transmitting them to the rest of the organization.

The Code of Ethics is mandatory, and for this reason, it will be subject to training and dissemination to its recipients.


No member of the entity, regardless of their level or position, is authorized to request an obligated person to contravene what is established in this Code of Ethics, and no one can justify their conduct by invoking an order from a superior or ignorance of it.

Title II. VALUES AND PRINCIPLES

Art. 4.- Our ethical values

The following are ethical values that must be respected by all members of our organization:

- a) **Integrity**, as ethical, transparent, honest, and good-faith behavior. It implies acting in accordance with non-negotiable ethical standards. Transparency entails a commitment to customers, employees, suppliers, and society in general, providing clear, truthful, and accessible information about the relationships we

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 5 de 22

are involved in, and being available at all times to address any doubts or questions they may have regarding them. We are committed to a zero-tolerance policy towards corruption, bribery, and fraud. It is our aim to avoid any actions that could be interpreted as dishonest and, in general, to require all employees to act with personal integrity, always promoting the long-term interests of the company above personal ones.

- b) **Respect for legality.** It is imperative to conduct business activities in accordance with applicable legislation at the national and international levels.


- c) **Respect for human and labor rights.** In addition to ensuring compliance with internationally recognized human rights, we guarantee the labor rights of our workers and the protection of their safety and health, with a commitment to maximizing their potential. To achieve this, we invest in continuous learning to achieve the professional development of our employees, promote a culture of well-being, and facilitate work-life balance. Likewise, we promote diversity and inclusion in our teams and ensure gender equality in all company processes.

- d) **Respect for individuals,** avoiding any type of harassment, intimidation, abuse, or lack of respect, with zero tolerance for any type of physical or verbal aggression.

- e) **Transparency and impartiality** in making any kind of decision.


- f) **Equal opportunities,** professional development, and non-discrimination both in access to work and in its promotion. Discrimination on the basis of sex, race, religion, marital status, sexual orientation, or any other differentiating factor will not be tolerated.

- g) **Fair competition.** We believe in free markets and fair competition conditions. Therefore, we commit to making decisions responsibly and respectfully,

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 6 de 22

complying with competition law, and avoiding any practice or conduct that could in any way restrict or distort the free competition of markets.

- h) **Teamwork and collaboration** are configured as instruments of opportunity and personal and professional growth.
- i) **Promotion of innovation and process efficiency** to better serve our customers and drive our growth.
- j) **Quality and our commitment to the environment** as the basis for growth.
- k) **Commitment to the customer.** Our customers not only demand quality products and services but also require us to act transparently and honestly. Our priority is always to fulfill this commitment in order to establish a relationship of trust and mutual benefit.
- l) **The Board of Directors and executives will serve as a reference model** in their behavior and level of compliance with the Code.
- m) **Responsible supply chain management.** It is important that employees who make purchases or acquisitions for our company assume their individual responsibility to work with responsible suppliers and partners, and carry out the established controls to ensure that, beyond the quality of the service provided or product delivered, they act responsibly towards their stakeholders at all times.
- n) **Territorial roots,** making it possible for our member cooperatives to develop their full potential and pass on all their benefits to their respective members, fostering the local economy and social dialogue.
- o) **Corporate image and reputation** that employees must consider in the exercise of their activity. Corporate image and reputation are one of the most valuable assets for preserving the trust of partners, customers, employees, suppliers,

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 7 de 22

authorities, and society in general.

Ethical values should determine the behavior of the organization as a whole, of the individuals who are part of it, and, in particular, of the corporate bodies and managers. Therefore, the Board of Directors and the executives of the entity will serve as a reference model in their behavior and level of compliance with the code.

Title III. OUR COMMITMENTS


Art. 5.- Compliance with applicable legislation and internal regulations

The subjects targeted by the Code, in accordance with their activity related to the entity, undertake to comply with the legal framework, the Code of Ethics, the company's bylaws, internal regulations, and agreements validly adopted by the competent bodies.

Likewise, they all commit to report any breaches they detect in the exercise of their functions.

OLIVITE EXPORT, SL will provide the necessary means for all recipients of the Code of Ethics to be aware of the relevant external and internal regulations for the functions they perform.

The entity and the subjects targeted by the Code undertake to adopt ethically exemplary behavior, refrain from engaging in, promoting, proposing, or encouraging any type of corrupt practice, and report to the competent bodies any manifestation of these practices that, in their opinion, is present or may affect the procedure. They will particularly refrain from taking any action that could violate the principles of equal opportunities and free competition.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 8 de 22

Art. 6.- Principles and policies to guide our activity and our relationships

a) Labor relations

OLIVITE EXPORT, SL does not tolerate child labor and undertakes to strictly comply with labor regulations. It guarantees all its employees access to the labor market in accordance with the legal framework, promoting equal and non-discriminatory treatment regardless of race, color, religion, sex, gender and sexual orientation, nationality, age, pregnancy status, degree of disability, and other legally protected circumstances.


Regarding the protection of health and physical integrity, the entity attaches utmost importance to preventing any type of risk for employees in the workplace. The entity will ensure a safe working environment, complying with current regulations on occupational health and safety. It will at all times comply with applicable laws and maintain a comprehensive policy for the prevention of occupational hazards appropriate to the company's activity.

b) Conciliation policy

OLIVITE EXPORT, SL undertakes to promote the improvement of the quality of life for its employees and their families, promoting measures aimed at reconciling work requirements with personal and family needs. It is our intention to promote the reconciliation of family and work life to encourage proper professional development.

c) Conflict of interest

In general, within the organization, all recipients of the code undertake to avoid situations that constitute a conflict of interest with those of the entity. In this regard, individuals may not use their rank or function in the entity, or the assets of the company, to obtain advantages and business opportunities for themselves or third parties.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 9 de 22

The principle is established of not employing relatives of employees, managers, or other members of the company without the appropriate justification and proof of qualification and the requirements of the position to be filled, and favoritism or benefiting some to the detriment of others is prohibited. Under no circumstances will arbitrary decisions be made without reasonable justification.

d) The Market

OLIVITE EXPORT, SL and each of its members undertake to comply with competition regulations, avoiding any situation that limits or restricts it.


The service policy and prices will be established fairly and will never be agreed upon with other agents and/or competitors to limit free competition.

Information from competitors that may reach the entity, violating its confidentiality, will be rejected, and efforts will be made to ensure the security of payment methods, data protection, and fraud prevention.

e) Relations with suppliers

Ethics and respect will govern relationships with suppliers, who will be selected based on objective and transparent criteria. Respect for the Code will be part of the criteria used when selecting a supplier, and, for this purpose, the Code of Ethics can be incorporated as an annex to the contract. Its non-observance may be grounds for termination of the contract.

Contracts will be made with suppliers who respect or adhere to the ethical values and principles of this code, both within the organization itself and in relations with OLIVITE EXPORT, SL.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 10 de 22

Members of the entity will refrain from promoting, facilitating, participating in, or covering up any type of corrupt practice, and therefore, no gifts, objects, services, benefits, or favors can be offered, promised, or accepted to obtain advantages in any type of relationship with suppliers.

f) Relations with institutions, authorities, officials. Public aid.


Members of **OLIVITE EXPORT, SL** must refrain from promoting, facilitating, participating in, or covering up any type of corrupt practice, and therefore their relationships with institutions, authorities, officials, will be based on honesty, transparency, suitability, and loyalty.

In general, in the event that the entity has access to public aid, it assumes the following obligations in calls for proposals and awards of grants and/or public aid it may access:

- Observe the ethical principles, standards, and canons corresponding to the activities, trades, and/or professions related to the activity subject to the grant or public aid.
- Do not take actions that put the public interest at risk.
- Communicate and/or report irregular situations that may arise in calls for grants or aid or in processes derived from these calls.

In addition to those provided for in other sections of this Code, in particular, OLIVITE EXPORT, SL, and the subjects targeted by the Code assume the following obligations:

- Immediately report possible conflict of interest situations to the competent body.
- Not directly or indirectly request that a public official or employee influence the awarding of the grant or aid.
- Not offer or provide public officials or employees with personal or material advantages, neither for themselves nor for third parties, with the intention of

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 11 de 22

influencing a grant or aid award procedure.


- Collaborate with the competent body in actions it takes to monitor and/or evaluate compliance with the obligations established in the call bases, particularly by providing the information requested for the same purposes related to the receipt of public funds.
- Fulfill the obligations to provide information that transparency legislation imposes on grant recipients regarding the Administration or administrations of reference, without prejudice to the fulfillment of transparency obligations that correspond to them directly by legal provision, in the cases established in the fourth paragraph of article 3 of Law 19/2013, of December 9, on transparency, access to public information, and good governance.

g) Gifts, commissions, or third-party remuneration

Giving or receiving gifts and invitations to recreational activities can affect objectivity and judgment and may also violate the legal framework, especially the regulations against corruption and bribery, therefore, all members of the entity will be very diligent in this matter.

Under no circumstances may donations, gifts, loans, or contributions of any kind be given, offered, or received in our relations with the public administration. This extends to our relations with political parties or candidates for public office.

In our relations with individuals, donations, gifts, loans, or contributions from suppliers or customers of OLIVITE EXPORT, SL may not be given, offered, or received. Excluded are those gifts of nominal value socially accepted, whose value does not exceed ONE HUNDRED EUROS (100.-€) and which may be made generically, on behalf of the entity, for example on the occasion of Christmas holidays and/or any event or act, such as meetings, birthday celebrations, etc. If the gift cannot be refused for cultural reasons, it will be accepted on behalf of the company and allocated to social purposes.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 12 de 22

h) Use of OLIVITE EXPORT, SL's goods and services

Efficiency will inspire the use of the entity's goods and services. Material and immaterial assets, and technological infrastructures, will be used only for professional purposes, responsibly, efficiently, and appropriately in the context of the activity, and, in any case, intellectual property regulations will be respected.

i) Intellectual and Industrial Property Rights

OLIVITE EXPORT, SL acknowledges its commitment to the protection of copyrights, patents, and trademarks, both its own and those of others, and demands the same commitment from all recipients of the code.

Special attention will be paid to including information about copyright in materials, information, products, services, and any documents of the organization and/or publications of any kind arising from the company's relationship with third parties, for public distribution.


j) Record-keeping and Information

It is essential to ensure that financial and accounting records are complete, accurate, and not misleading.

Proper records of the entity's financial and accounting records will be maintained, and all books, records, and accounts, including time records, sales records, invoices, receipts, and expense reports, must be complete, accurate, and reliable.

k) Confidentiality of Information

All members of **OLIVITE EXPORT, SL** are required to protect the information and knowledge generated within the organization, which is owned or held by the

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 13 de 22

organization. Consequently, confidentiality must be respected, and it must be used in accordance with internal regulations for any data, information, or document obtained during the exercise of professional activity.


I) Document Retention and Personal Data Protection

OLIVITE EXPORT, SL undertakes to comply with legal and regulatory requirements regarding document retention and disposal. Every record will be treated in a manner that ensures that:

- Archiving, storage, and retrieval of recorded information are always carried out in an organized manner.
- Record maintenance, in its format, meets legal, tax, regulatory, and operational requirements.
- Records and backups are protected.
- The necessary documentation is available in case of legal proceedings.
- The disposal of documents that no longer have value, both in printed and electronic format, is carried out appropriately and timely.

It is our commitment to ensure the protection of personal data. Access, processing, and transmission of personal data will be carried out with the authorizations and control measures established by regulations. In the processing of personal data, the following principles will be applied, which comply with the requirements of Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, as well as Organic Law 3/2018 on the protection of personal data and guarantee of digital rights:

- Principle of lawfulness, fairness, and transparency.
- Principle of data minimization.
- Principle of limitation of storage period.
- Principle of integrity and confidentiality.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 14 de 22

m) Money Laundering and Terrorism Financing.

OLIVITE EXPORT, SL will ensure that no money laundering and terrorism financing activities can take place within the organization, as it recognizes the importance of preventing financial crime, as it can affect essential aspects of the economy and social life. Likewise, it expresses its full solidarity and maximum collaboration with the competent authorities in this matter.

n) Sustainability and Environmental Commitment

OLIVITE EXPORT, SL undertakes to ensure respect for the environment, to minimize the environmental impact in all its activities, and to promote the culture of environmental respect as a guiding principle of behavior.


Members of the organization must know and assume this policy and act at all times in accordance with respect and sustainability criteria, as well as adopt habits and behaviors of good environmental practices and contribute positively to achieving the objectives established in the organization's environmental policy.

o) Obligation to Report/Denounce

All recipients of the code are obliged to report any irregularity or indication of non-compliance with these principles and policies, of which they may become aware in the exercise of their respective responsibilities, preferably through the internal information channel or ethical channel.

Art. 7.- Commitments of Shareholders

Shareholders, as participants in the entity, are co-responsible for its proper functioning.


	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 15 de 22

Being a shareholder of OLIVITE EXPORT, SL implies a common sense of belonging to the entity, which is reflected both socially and in its business activity, so it is necessary that, in addition to being subject to the generic commitments of this Title III, the commitments that shareholders acquire towards the entity and its members are established:

- Shareholders identify with the values and principles developed in this Code of Ethics.
- They commit to respecting the dynamics and decisions made within the company.
- They must have an active, positive, and critical participation, collaborating for the improvement of the entity.
- They will report illegal, irregular, and contrary practices to this Code, of which they become aware.
- They will promote and act to ensure the good name and image of OLIVITE EXPORT, SL.

In addition, good governance of the company is the work and responsibility of all shareholders, and the requirement for ethical behavior extends to everyone without exception, within the framework of their functions. Consequently, the role of shareholders in the General Meeting impacts the way OLIVITE EXPORT, SL operates and acts, and within the sovereign body:

- Shareholders will act responsibly in adopting agreements at the General Meeting.
- They will act loyally to the objectives and interests of the entity.
- They will assume responsibility and independence in decision-making in the votes that are proposed.
- They will act honestly in selecting the best individuals for the exercise of the positions and functions that correspond.
- They will prioritize the common good of the entity over individual and short-term interests, understanding that the common interest of the entity is equivalent to the interest of all its members, current and future.


	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 16 de 22

Furthermore, shareholders must assume responsibility for the positions for which they have been elected at all times, and, in particular, actively participate in the exercise of the assigned positions and functions.

Art. 8.- The Board of Directors

The Board of Directors, as the governing and management body of the organization, is entrusted with the functions provided by law and the bylaws. Its role is essential to instill a culture of ethics and regulatory compliance throughout the organization. The Board of Directors and its members commit to:

- Prioritize and defend the common interest of the organization, ensuring its long-term viability.
- Act with diligence and loyalty, prudence, discretion, and honesty.
- Dedicate the time and attention necessary to fulfill the duties of a Board member.
- Define, in collaboration with management, the future direction of the organization, assuming strategic decisions that affect the company's future.
- Be responsible for delegations of authority to management and powers of attorney, periodically reviewing their suitability.
- Monitor the achievement of objectives and take corrective measures, if necessary.
- Encourage shareholder participation in the company's social structure.
- Resolve conflicts based on open and constructive dialogue.
- Lead the internal dynamics of the organization and encourage its members to comply with this Code of Ethics.
- Ensure truthfulness and transparency in their actions, adhering to the Law, Bylaws, Procedures, this Code of Ethics, and internally adopted agreements.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 17 de 22

Art. 9.- Management and Executive Bodies

The management and executive bodies of the organization have the primary mission of operationally developing the company's strategic lines.


Good governance of **OLIVITE EXPORT, SL** requires exemplary behavior from the management and executive teams towards the organization's members, both internal and external. Therefore, they will ensure:

- Executing the daily management of the organization in accordance with the values, principles of this Code of Ethics, the Law, and internal company regulations.
- Respecting and managing decisions made by various corporate bodies.
- Maintaining loyalty to corporate bodies by providing clear, truthful, and periodic information.
- Directing and leading the organization's work teams and individuals, ensuring their motivation and satisfaction.
- Promoting the development of individuals and their careers.
- Maintaining confidentiality regarding activities within the company.

Art. 10.- Employees

Employees who are part of **OLIVITE EXPORT, SL** play an essential role as they represent the organization to society. It is paramount that they have a solid and socially responsible ethical foundation.

Employees of the organization are subject to the Code of Conduct, which constitutes a formal declaration of the values and ethical standards by which the organization's workers are governed.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 18 de 22

Art. 11.- Other Stakeholders

OLIVITE EXPORT, SL, as a company offering goods and services, interacts with the market. In the entity's relationships with third parties, whether contractual or non-contractual, compliance with this Code of Ethics will be ensured.


In particular, in its relationship with customers and third-party suppliers, the organization will:

- Ensure good treatment, respect, trust, compliance with obligations, and quality in the products offered.
- Offer products and services with the highest levels of quality, appropriate prices, and compliance with obligations.
- Adhere to principles of honesty, impartiality, respect, trust, integrity, and ensure that no action may be interpreted as deceit to the detriment of customers and/or third parties in general.
- When negotiating on behalf of OLIVITE EXPORT, SL, it will be necessary to provide information in a complete, transparent, understandable, accurate, and precise manner.
- In the event of incidents and customer complaints, these must be properly handled.
- Personnel involved in supplier selection activities must apply criteria of objectivity and transparency.
- Any situation of conflict of interest or act of corruption is prohibited.

Title IV. COMPLIANCE WITH THE CODE

Art. 12.- Compliance with the Code, Control, and Disciplinary Regime

The **ETHICS COMMITTEE** will be the body responsible for overseeing the effectiveness of the organization's internal controls. Specifically, among other duties, it is entrusted

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 19 de 22

with the following functions:


- a) Preparation of the documents that constitute the Code of Ethics, as well as any updates that may be carried out.
- b) Monitoring the functioning, effectiveness, and compliance with the Code of Ethics and regulatory compliance of the organization.
- c) Responsibility for promoting and coordinating the implementation, monitoring, and control of the Code of Ethics and regulatory compliance of the organization.
- d) Promotion of an ethical culture within the organization.
- e) Periodic verification of compliance with the Code of Ethics and regulatory compliance of the organization and checking whether the existing controls are sufficient and effective, proposing corrective and/or complementary measures, if necessary, to ensure compliance.
- f) Management of the Internal Information System and the **ETHICS CHANNEL**.
- g) Proposing to the Board of Directors, if necessary, to adopt disciplinary measures, both at the social and labor levels.

Title V. VIOLATIONS OF THE CODE OF ETHICS

Art. 13.- Violations of the Code

In case of non-compliance with this code and/or its development protocols, as well as any regulatory non-compliance, immediate action will be taken as follows:

- a) If the non-compliance constitutes a crime or infringement of any kind, the Board of Directors and/or the Ethics Committee must immediately report the fact to the competent authorities.
- b) If the non-compliance is external by a supplier, the Board of Directors and/or the Management must take appropriate and relevant measures regarding the contractual non-compliance.

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 20 de 22

- c) Socially, in the event of non-compliance by a partner of the organization, the Board of Directors will adopt the disciplinary measures that are appropriate in the strictly corporate sphere, in accordance with the social statutes and the law.
- d) Likewise, in a labor context, if the non-compliance is committed by an employee of OLIVITE EXPORT, SL, the Board of Directors will apply the Code of Conduct, as well as the collective bargaining agreement and the applicable labor regulations, and will take the disciplinary measures that are appropriate in the strictly labor sphere, in accordance with the principle of good faith contractual relationship between the employee and the company.


The Board of Directors and/or the Management will agree on disciplinary measures when, by those obliged by this Code, any of the following infractions are committed:

- a) Non-compliance with any of the guidelines provided in the Code of Ethics and/or the policies, measures, or procedures established in the regulatory framework of the organization.
- b) Impeding or hindering the discovery of behaviors that involve irregularities or non-compliance by other employees or members of the corporate bodies.
- c) Failure to report through the internal channel or ethics channel (or other means) potential risks and non-compliance by the recipients of the code.
- d) Making communications and/or complaints with knowledge of their falsehood or with reckless disregard for the truth.
- e) Any violation of the values and principles of this Code of Ethics, when such non-compliance, whether by action or omission, causes serious harm to OLIVITE EXPORT, SL, for the recipients of the code, or for third parties.

Title VI. INTERNAL INFORMATION SYSTEM AND ETHICS CHANNEL

Art. 14.- Internal Information System

In accordance with Law 2/2023, of February 20, regulating the protection of

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 21 de 22

whistleblowers and the fight against corruption, **OLIVITE EXPORT, SL** will have an **Internal Information System**. Its operation is outlined in the Internal Information System Policy, approved by the Board of Directors, and will be operational before December 1, 2023.

Any member of the organization, as well as suppliers and even third parties with a labor relationship with the organization, must report, in good faith and without fear of retaliation, any irregularity, non-compliance, or unethical conduct carried out by a recipient of this Code of Ethics or any other irregularity detected in the organization.

The communication will be made anonymously or under the strictest confidentiality. In any case, the anonymity of the communications will be guaranteed, protecting them from possible consequences arising from their submission.


Communications or complaints, if any, can be sent to the organization through the Internal Information Channel enabled on the official website of OLIVITE EXPORT, SL <https://oliviteexport.com/>, which contains a link to the ethics channel.

Communications or complaints made in bad faith, knowing their falsehood or with the purpose of harming any recipient of the code, will be subject to sanctions for violation of the Code of Ethics, without prejudice to the possible criminal liability for the commission of an offense of slander or defamation, or civil liability for injury to the right to honor.

Title VII. DISSEMINATION AND APPLICATION OF THE CODE

Art. 15.- Dissemination and Application of the Code

All individuals who are part of OLIVITE EXPORT, SL have the obligation to know and apply this Code, with members of the Board of Directors being especially obliged, who

	Plan for Prevention of Penal Risks	Version 1
		Last Revision Date: N/A
	Code of Ethics	Version 1
		Page 22 de 22

will demand its application, dissemination, compliance, and execution from the recipients. Likewise, the provisions of this Code are made known to all suppliers of goods or services who have relationships with the organization, incorporating their observance or adherence as a contractual clause.

The Code will be made available to all recipients and will remain posted in a freely accessible location. The Code will be the subject of communication, training, and awareness-raising actions for its timely understanding and implementation throughout the organization.

Final Provision

This Code of Ethics is immediately applicable once approved by the Board of Directors.

Derogatory Provision

Any other Code of Ethics of this organization regulating the same subject matter and that is prior to or in conflict with this one is hereby repealed.

Prepared by	Reviewed by	Approved by	Date of Approval
Board of Directors		Board of Directors	February 2024