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TITLE I. GENERAL PROVISIONS

Article 1. Introduction

1.1

Pescapuerta and its Group of Companies (hereinafter, Pescapuerta or the Company) aspire that their conduct and that of the people and entities linked to them, respond to and comply with both, current legislation and their ethical and social responsibility principles.

1.2

The Supplier Code of Ethics (hereinafter, the Code) is understood as an extension of the Company's Code of Conduct, and its purpose is to establish the minimum guidelines that suppliers must maintain for the proper development of their activity, expressing their commitment to some basic principles of ethics and professional conduct.

Article 2. Scope of application and enabled channels.

2.1

The Supplier Code of Ethics is applicable to all Suppliers that establish or intend to establish commercial relations with the Company. It also applies to Subcontractors, that is, companies that provide services for the Company through a Supplier .

2.2

Throughout this Code, all of them will be referred to under the generic name of Suppliers.

Article 3. Obligation to know and comply with the Code of Conduct of Pescapuerta and its Group of Companies

3.1

Suppliers have the obligation to know and comply with the Code of Code that Pescapuerta has approved, and which is available to them on the company's website (<http://www.pescapuerta.es/>). Suppliers must adhere to it, expressing their commitment to comply with the ethical principles of Pescapuerta established therein.

3.2


It will be the obligation of each Supplier to inform their workers of the content of the Code and the obligation to apply it to the extent that their activities affect the Company.

3.3

If a Supplier seriously breached this Code as well as the Code of Conduct, this may lead to the termination of its relationship with Pescapuerta, all without prejudice to the adoption of other measures that the Company may take in defense of its rights.

3.4

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Notwithstanding the provisions of the Code of Conduct, a series of conduct guidelines and ethical principles for Suppliers are set out below, which must be complied with in the exercise of their business activities.

TITLE II. ETHICAL PRINCIPLES

Article 4. Corruption

4.1

Suppliers must carry out their business activities with integrity, objectivity, transparency and honesty, without participating in bribery, corruption, extortion or any other illegal or unethical practices.

4.2

In its relations with Public Administrations, the Company completely prohibits any type of bribery to authorities, public officials or managers or employees belonging to companies or public bodies of national or international scope.

4.3

Suppliers will comply with the strictest standards of ethical and moral conduct, international conventions, and will respect the applicable laws on this matter, ensuring the establishment of adequate procedures that are required for this purpose.

Article 5. Confidentiality

5.1

Suppliers will maintain strict confidentiality regarding all non-public information that they receive in the course of their work, complying with current legislation on data protection and intellectual property.

5.2

Likewise, the information that Suppliers provide to the Company must be truthful and governed by the principle of transparency.


Article 6. Commitment to the environment

6.1

Suppliers must rigorously comply with their obligations in environmental matters, also having an effective environmental policy or adequate equivalent measures, depending on the products and services supplied.

6.2

Suppliers must actively commit to preserving the environment, respecting legal requirements and trying to reduce, as far as possible, the environmental impact in carrying out their activities.

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Article 7. Quality and safety of the products and services supplied

All products and services delivered by Suppliers must comply with the quality and safety standards and parameters required by applicable laws.

Article 8. Prevention of food fraud

Suppliers must have measures in place to eliminate any form of food fraud, understood as the production and / or marketing of food intentionally in breach of current food legislation, with respect, mainly, to the supply of products of a lower quality or quantity or different from that indicated on the package.

Article 9. Labor practices

9.1

Suppliers will not participate in or allow forced labor.

9.2

Suppliers will eradicate the use of child labor and will not tolerate or use child labor in any phase of their activities.

9.3

Suppliers will respect the freedom of union association and the right to collective negotiation of workers.

9.4

Suppliers must treat their employees with respect and dignity, maintaining the same opportunities when accessing a job or promoting within the company, and ensuring the absence of situations of discrimination based on sex, sexual orientation, race, marital status, social status, religious, political or labor union ideas, age or disability.

9.5

Suppliers will pay their workers in accordance with applicable wage laws.

9.6


Suppliers will guarantee their employees a safe working environment, always complying with the minimum requirements of occupational safety, health and hygiene in terms of occupational risk prevention, and in accordance with internationally accepted standards.

TITLE III. ETHICAL CHANNEL

Article 10. Ethical Channel of Suppliers

10.1

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The Company has an Ethical Channel that guarantees that any Supplier who is aware of a breach of the provisions of this Code, or of any serious illegal act that may affect the Company, done by a professional of the Company, a Supplier, or their respective employees, can communicate it in a simple way to the Company, so that it can put in place the appropriate mechanisms for its analysis and eradication.

10.2

This Channel may also be used to make inquiries in relation to the application and interpretation of the provisions of this Code. For this, the following routes have been enabled:

- a) e-mail: comitesupervision@pescapuerta.es.
- b) ordinary mail: Avenida García Barbón, nº 109, 4º, 36201, Vigo, Pontevedra.Spain

Artículo 11. Comunicaciones remitidas a través del Canal Ético

11.1

Communications made through the Ethics Channel must always meet criteria of truthfulness and proportionality, and cannot be used for purposes other than those that seek compliance with this Code or current legislation.

11.2

The data of the person who files a complaint through the Ethics Channel (in the event that he / she identifies himself) will be treated as confidential information. The company guarantees the proper treatment of personal data and compromises not to adopt or allow any form of retaliation, direct or indirect, against the person who in good faith has used this Ethical Channel.

TITLE IV. FINAL PROVISIONS

Article 12. Approval and modifications

12.1

This Supplier Code of Ethics was approved by the Supervisory Committee of the Company's Code of Conduct, dated February 27, 2020, being in force for the entire Company from that day on.

12.2

Any modification of this Code will be the competence of the Pescapuerta Supervision Committee.