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# Code of Conduct for Suppliers of Products and Services

## Grupo Conservas Garavilla

### *Introduction.*

The Grupo Conservas Garavilla (hereinafter *GCG*) is one of the leading companies in the manufacture and distribution of marine-derived food products, with famous and recognized brands such as *Isabel* and *Cuca*. As explicitly stated in its quality policy, *GCG* has committed to meet the needs and expectations of our customers and consumers by providing safe and quality products.

## MISION

Grupo Conservas Garavilla is fully committed to achieving the following strategic objectives:

- ✓ *Ensuring the long-term viability of our organization by maximizing the value of its shareholders' investment while adapting to the changes the different markets continually demand.*
- ✓ *Positioning GCG as a benchmark in the food sector by placing safe, healthy products at our customers' disposal, with the best price-quality ratio in the market and fully meeting their needs and expectations.*
- ✓ *Offering our consumers reliable, tasty and fun products which form a small part of their lives and of fond moments with family and friends.*
- ✓ *Controlling and constantly perfecting our production processes, developing and offering our customers innovative products that meet the highest international standards of quality and food security, while minimizing the impact of our centres of activity on the environment.*

## VISION

Grupo Conservas Garavilla is identified with the following principles:

- ✓ *Being recognized as the most responsible, efficient and competitive company, with an ongoing commitment to security, health and caring for the environment and to the sustainability of marine resources and their habitat, adopting and promoting responsible fishing.*
- ✓ *Being the leader in the Spanish market but with a global vocation, aimed at generating value for the company, its customers and its employees.*
- ✓ *Being the best alternative for the offer of safe, healthy, tasty and innovative foods, produced while respecting at all times the ethical criteria that should govern human and commercial relations.*

## VALUES

These values represent the identity of Grupo Conservas Garavilla as an organization. The values that govern our actions and guide our decisions are:

- ✓ *We believe in people. We guarantee development opportunities based on merit and personal contribution.*
- ✓ *We are committed to the well-being of our employees and collaborators. We aim to be an agent of positive social change throughout our products' entire supply chain.*
- ✓ *We foment teamwork. We seek participation and communications between all of us to reach a common target, sharing information and knowledge.*
- ✓ *We behave with integrity. We firmly believe that the company's activity should be based on the responsible, honourable, ethical conduct of all the people who form part of the organization.*
- ✓ *We seek excellence. We work with rigour and transparency, focusing our efforts on customer satisfaction and on attaining the objectives of our business project.*
- ✓ *We offer safe, healthy, innovative products to win over the confidence and affection of our customers and consumers. We promote responsible eating, offering affordable high-quality products for a healthy diet.*
- ✓ *We have a social and cultural commitment to the community and we adapt our business strategies to care for the environment and to preserve marine resources and their habitat.*

GCG considers extremely important, as an active agent in the sector of the processing seafood industry, to behave as expected for a socially responsible organization. Therefore, we strive every day in conducting all the activities carried out in our facilities and those of our partners and suppliers with the utmost respect and consideration for human rights, ethics that should govern human and trade relations, respect for the environment and concern for the sustainability of resources.

From the perspective of our customers and consumers of our products we are responsible, from extraction of the sea until they reach their hands, for the entire supply chain of the products we offer. It is, therefore, essential for us to get to place their trust not only on our products but also on our values and attitudes.

To achieve this strategic goal, GCG has adopted its Code of Ethics and Conduct (hereinafter, the *Code*) which aims to establish the basic principles and commitments which are expected and should be demanded to all the companies in GCG, to all its employees, managers and governing bodies, constituting a framework of common integrity for all of them in performing their professional activities and in their relations with stakeholders.

The GCG's Code of Ethics and Conduct was adopted by the Board of Directors and approved by Grupo Conservas Garavilla's CEO. It describes the values, principles and practices which guide GCG's business conduct. The Code of Ethics and Conduct reflects Management's goal of reinforcing the ethical standards applicable to our entire organization and of fomenting a working environment where integrity, respect and fairness are promoted. Management is convinced that the best way to serve the company's interests in the long term is to strictly follow a policy of observance of legality, high principles and social responsibility in all its business activities.

The GCG's Code is totally in line with the Bolton Group's Code of Ethics, which is included in its Internal Control & Reporting Manual, and with the Human Rights Policy of the Bolton Group.

The GCG's Code, together with the Bolton Group's Code of Ethics and with the Human Rights Policy of the Bolton Group, shall be considered high level mandatory commitments which serve as the basis for both GCG internal activity and for the relationship of GCG with all its stakeholders and, particularly with all its suppliers of products and services. Based on these principles, the present **Code of Conduct for Suppliers of GCG** has been developed for better communicating to GCG's suppliers the highly ethical behaviour standard that is expected from them in order to become and to keep being part of GCG supplier family.

The minimum requirements that are required to GCG's suppliers of products and services will always comply with the legislation applicable to them within the scope of its activity, both locally and internationally.

### *Commitments and responsibilities.*

#### **Commitment with people: Human Rights Policy.**

Respect for fundamental human rights is an essential element of the Sustainability of the Bolton Group and, therefore, of GCG. Dignity and respect for the individual are at the heart of our corporate culture.

GCG is committed to promoting the respect of Human Rights and eliminating their violation, both within the Company as well as among its suppliers.

GCG's relationships with its stakeholders are based on transparency and mutual trust. For this reason, GCG implements and supports the internationally recognized Human Rights laid down in the *Universal Declaration of Human Rights* and the conventions which it inspired, such as the ILO Declaration on Fundamental Principles and Rights at Work, the United Nations Conventions on the Rights of the Child, the Children's Rights and Business Principles promoted by UNICEF, Global Compact and Save the Children.

The GCG's Human Rights Policy is grounded in the Group's core values and Code of Ethics. Respect for the principles expressed in this Human Rights Policy is to be considered as an integral part of the duties of all our employees and suppliers.

#### ***Child and Forced Labour.***

*The use of forced labor by a supplier will not be tolerated under any course. Every worker must take his place on a voluntary basis and should have secured decent contractual terms.*

It will be not tolerated under any assumption the use of child labor. GCG assumes the defense of the children and the child's right to receive a decent education. All GCG suppliers must guarantee that they do not employ children under the age of 16, or higher if stated by local normative for the minimum age for employment. Special attention should be paid to workers under 18 regarding the number of hours worked and the type of activity, as specified in the relevant ILO Conventions.

We reject any kind of forced labour as defined by the reference ILO Conventions and Recommendations.

### **Free Association and Collective Bargaining**

Workers should be entitled, without any restrictions, to freedom of association and to membership of legal organizations that represent their interests as employees. The employer must respect the right of employees to collectively negotiate the terms of their partnership without retaliation, intimidation or harassment.

We are committed to establishing a constructive dialogue with the workers' freely chosen representatives, basing all negotiations on mutual respect and good faith and so we ask from all our suppliers.

### **Working and Pay Conditions.**

All workers, including temporary ones, must be legally recruited in accordance with agreed contractual conditions. Agreed working conditions and wages must be at least those established by local law enforcement for the sector. The ways in which their remuneration is defined shall be based on objective criteria.

Working overtime shall be adequately paid following the criteria stated in local legislation on the matter.

The maximum number of hours and days off work must comply with the provisions of the implementing local legislation. Workers must have at least one day off every seven days of continuous work. However, exceptions may be permitted during certain periods such as during the harvest as stated in the ILO Conventions on this matter.

Workers should be entitled to vacation and, as appropriate, justifiable absence permits granted by the company without incurring negative consequences or unilateral termination of the employment relationship by the employer.

### **Respect for Individuals and Diversity.**

*All workers should be treated with respect regardless of gender, religion, sexual orientation, race or geographic origin, political belief, age or disability*

We respect diversity and the right to equal opportunities. We do not tolerate any form of discrimination of race, colour, gender, language, religion, nationality, political opinion, sexual orientation or social status and we encourage the promotion of an ethical conduct within the workplace.

In the same way, we are committed to preventing any form of physical, verbal, sexual or psychological harassment or abuse, as well as threats and intimidation at work.

It is the responsibility of the suppliers of GCG to ensure that communications with their employees are understandable to them, using the language commonly used by the worker.

### ***Health and Safety Protection.***

*The working environment must be safe. Measures should be taken to prevent occupational hazards*

We provide a healthy and safe working place for all our staff in compliance with the health and safety laws in force. We are committed to keeping the working places productive and safe, minimizing the risk of accident or injury. We are also committed to involving our staff in the constant improvement of the health and safety conditions of our workplaces in line with the local laws.

We guarantee our employees the right of access to preventive health care and to benefit from medical treatment under the conditions established by local laws and practices.

GCG partners are encouraged to establish action plans for continuous improvement of the working environments. Action plans and protocols should be established to ensure appropriate care for affected workers when needed.

### ***Rights of Local Populations.***

*We commit our suppliers to pay special attention in respecting the rights of the local communities in the areas of their operational activities.*

We conduct our activities while respecting the rights of the local communities inhabiting the areas where the Group operates with its plants and we pay attention to the most vulnerable local communities.

### ***How to Report Breaches.***

In case of any reasonable suspicion of non-compliance with GCG's requirements in relation to human rights, suppliers are requested to immediately inform GCG through the official channels established for this purpose and, in any case, may communicate the incidents to their business contact, to GCG Compliance Function or to the GCG Corporate Social Responsibility Directorate.

In the event of a non-compliance with the Policy, its causes will be studied and a plan will be defined, always in cooperation with the affected supplier, in order to promote compliance.

## Commitment with Sustainability of Resources: Tuna and other Seafood.

Fishing, including fish farming, is a vital source of foods, employment, recreation, trade and economic well-being for populations all round the world, both for present and future generations and, thus, it must be carried out in a responsible manner.

- All the fish and other products from the sea must be caught, brought to land, cultivated and processed with absolute respect for the applicable legislation, and these activities must be inspected by the local and regional authorities competent in the matter. The right to fish brings with it the obligation to do it responsibly in order to ensure conservation and the effective management of marine resources.
- All the raw materials must be traceable to their origin and, to this end, our suppliers should have implemented (and checked) a system that guarantees this traceability to origin.
- Marine species which are considered to be endangered and which appear in Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
- The utilization of fish and other marine products will be evaluated in accordance with the recommendations of local and state authorities, regional fisheries management organizations (RFMOs) and the FAO's Department of Fishing and Aquaculture for the sustainability of fisheries.
- In no case will the use of destructive fishing methods, such as the use of dynamite or toxins be tolerated.
- Do not use tuna caught in Marine Reserves or protected areas identified by Coastal States, as those identified by PNA in WCP Ocean high seas.
- Certificates from the Earth Island Institute will be required to guarantee that fishing methods do not harm dolphins.
- We express our commitment to improving traceability and stopping illegal fishing (IUU): we shall not enter into commercial relations with companies involved in episodes of illegal fishing, which have a single ship on the European Union's IUU list or on another official list of the RFMOs.

As an active member of the International Seafood Sustainability Foundation (ISSF) since 2010, both our fishing policy and acquisitions from third parties abide by the recommendations issued by the ISSF. All GCG tuna suppliers are required to verify on the ISSF website ([www.issf-foundation.org](http://www.issf-foundation.org)) the specific Conservation Measures in force required to supply tuna and tuna-based products to GCG. In order to facilitate compliance with these requirements, GCG will publish a **Guide for Tuna Suppliers** that includes a catalogue of evidences to be used to demonstrate compliance with each of the ISSF conservation measures within its scope.

We agree with the ISSF on the advisability of a global scientific approach, respecting the indications that arise from the most recent updates of the state of fisheries ([www.iss-foundation.org](http://www.iss-foundation.org)) and its resolutions. In particular, we undertake:

- Not to carry out uncontrolled transfer practices in the open sea or to enter into trade relations with companies that carry out, protect or defend this type of practice.
- We forbid any activity to mutilate sharks solely for the commercial exploitation of their fins (shark finning). We will not enter into trade relations, and where relevant will break them, with any company that has not made public a policy expressly forbidding this activity.
- We are in favour of the creation of a single global list of fishing boats based on the UVI number (Unique Vessel Identification) issued by the International Maritime Organization (IMO) and we will only obtain tuna from ships with the said number (with the exception of products from artisanal fisheries whose fishing boats cannot access this register).

Lastly, GCG totally assumes the “Guide to Good Practices of the Tuna Fleet Fence Freezer” proposed by OPAGAC/AGAC, of which GCG forms part. GCG supports initiatives such as the “Responsible Tuna Fishing” certification, sponsored by OPAGAC and undertakes to certify its fleet under this standard. Moreover, it undertakes to participate in the FIPs (“Fishery Improvement Projects”) promoted by OPAGAC.

### Commitment with Food Safety, Product Quality and Nutrition.

As it is evident in the Quality Policy undertaken by our organization, safety and quality of the products we offer is a strategic priority for GCG. In connection with GCG suppliers this means that:

- Every product or service supplied to GCG must be strictly managed and undergo the criteria set out in the purchase agreement.
- GCG requires its suppliers that must be authorized to carry out their activities by local authorities and, where appropriate, the establishments must be approved for export to the European Union, they must appear on the official lists of approved establishments by the Directorate-General for Health and Consumer Protection of the European Commission (DG-SANCO).
- *The implementation of certified management systems for food safety will be highly valued*, encouraging all our suppliers to take this path. GCG will conduct periodic evaluations of our supplier facilities and procedures to guarantee the final quality of the products we produce and to verify that our partners take into account our expectations about continuous



improvement in all their activities. Companies that agree to undergo the homologation supplier process established by GCG must accept all the audits required by GCG in the scope of food safety and / or social responsibility.

- All suppliers must ensure that the products supplied to GCG are safe and that the content of contaminants and undesirable substances potentially present are below agreed limits with GCG Quality Services, local legal limiting values of application and, in all cases, below their legislated limits in the European Union<sup>1</sup>.

### **Commitment with the Environment: Environmental Policy.**

*It will be highly appreciated that our suppliers display a high degree of environmental awareness and that this will result in a clear effort to minimize the impact their activities may have on the environment.* They are encouraged to take all measures in their hands, not only tending to minimize the negative environmental impact, but to move towards improving their environmental conditions.

GCG encourages its providers to adopt and assume a documented environmental policy and to establish action plans to cover the most important aspects of its business which could adversely affect the environment. Their environmental management systems should become ISO 14000 certifiable in the middle term.

### **Company relations with third parties: Anti-corruption Policy.**

GCG has adopted very stringent requirements in terms of honesty and integrity in our internal relationships and expect the same level of demand in relations with our partners and suppliers.

### **Gifts, services and other presents.**

We reject any type of corrupt act. Giving or receiving bribes is illegal, essentially unethical and may have severe consequences for everyone involved, including the deprivation of individuals' liberty and hefty fines for the company. We are committed to conducting our operations with transparency and integrity and, consequently, all our transactions must comply with anti-corruption laws, including the requirements of keeping full, accurate accounts books and records.

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<sup>1</sup> Reference is assumed to European legislation on contaminants possibly present in food. The core corpus is given by the so-called "hygiene package" consisting of, among others, by Regulation (EC) 852/2004 Regulation (EC) 853/2004 and Regulation (EC) 854/2004 of 29 April. Regulation 2073/2005 of the Commission of 15 November 2005 on microbiological criteria for foodstuffs and Regulation (EC) 1881/2006 of the Commission of 19 December 2006 fixing maximum levels for certain contaminants in foodstuffs.

We must not request, negotiate or accept gifts or presents from suppliers, consultants or service providers for our own benefit or for the benefit of others, unless this action is legal, ethical and a generally accepted business practice between GCG and the third party.

We cannot accept or give any type of presents that might jeopardize or appear to jeopardize our decision-making process in some current or future negotiation. Conditioning or seeking to condition a negotiation in exchange for a gift, service or present is forbidden.

Gifts, services and other presents from customers, suppliers or current or future consultants are only acceptable when they are given with legitimate business ends. Moreover, gifts, services or other presents may not be received from third parties, except when they are legitimate promotional materials or are in line with acceptable business standards and practices. Accepting these presents should not jeopardize or appear to jeopardize our integrity and objectivity or create an expectation of obligation towards the third party.

Gifts, services and other presents for customers, suppliers, consultants and current or future service providers are only allowed when they are given with legitimate business ends or they are legitimate promotional materials. These presents must always be legal and in line with acceptable business standards and practices. Trying to condition a commercial negotiation with a present for a customer, supplier, consultant or service provider is forbidden.

#### ***Bribery and/or blackmail.***

In no circumstances is bribery and/or blackmail permitted. If anyone at the company is being bribed and/or blackmailed in their work relations inside or outside the organization, they should immediately report it. Likewise, when we know that a third person is being subjected to some kind of bribery and/or blackmail, it is everyone's responsibility to report it.

#### ***Conflict of interest.***

A conflict of interest occurs when your personal interests or the interests of a third party compete with the interests of GCG. If a conflict of interest has occurred or you find yourself faced with a situation that could involve or give rise to a conflict of interest, notify to the Internal Control Body of Compliance Function, as soon as you are aware of the situation, in order to resolve the situation fairly and transparently.

***GCG Access for verification and report of non-conformities.***

To give permission to GCG staff or their representatives for verifying the full compliance with this Code of Conduct will be a necessary precondition for the establishment of trade relations between GCG and any supplier.

Providers may be required to report to GCG about their businesses relationship with any subcontractor related at any level with the products or services contracted by GCG. It is the supplier's responsibility to guarantee that these subcontracted suppliers know and apply this Code of Conduct. In any case, it is responsibility of the GCG homologated supplier to guarantee that all products they provide to GCG meet all the criteria required by the applicable European legislation, at any time.

*Issued by: Órgano de Control Interno – Compliance Function*

*Approved by: GCG Chief Operating Officer*

**TO BE COVERED BY THE SUPPLIER:**

By signing this document, we accept the requirements stated in,

- Code of Conduct for Suppliers of Group Conservas Garavilla, S.L.
- Code of Ethics of Bolton Group
- Human Right Policy of Bolton Group

<b>Company:</b>			
<b>Name:</b>			
<b>Function/ Position:</b>			
<b>Signature:</b>		<b>Stamp:</b>	

Date:

*Please, send signed copy to GCG:*

- *Commercial contact person.*
- *GCG Compliance Function.*
- *GCG CSR Directorate.*