

# CODE OF ETHICS AND GOOD BEHAVIOUR



**Nederland**

BARCELONA 1935



## **Introduction**

Objectives of the code	3
Use of the code	4
Terminology	4

## **Responsibilities between people**

Health and safety at work	5
Measures against harassment and/or degrading treatment	6
Fair and equal treatment	7
Processing of personal data	7
Conflict of interest, gifts and invitations	8

## **Responsibility to protect information and assets**

Protection of company assets and property	9
---	---

## **Responsibility in/with the market**

Communication	10
Monopolisation and unfair competition	10
Quality	11

## **Corporate responsibility**

Human rights	12
Environment and social development	13
Voluntary, dignified and free work	14
Unlawful practices: bribery, money laundering, extortion and corruption	15



## Introduction

### OBJECTIVES OF THE CODE

The Code of Conduct and Good Behaviour of Nederland, S.A. aims to be a framework of values, actions and desirable behaviour on which the company bases any of its commercial and non-commercial relations with its stakeholders. In the same way, this code aims to establish principles on which any internal or external collaborator of the company should act in the performance of their duties.

Nederland, S.A.'s business model is based on the development of the stable and long-term partnership with each of its different stakeholders. It's therefore very important to establish relationships based on trust, transparency, honesty and mutual commitment to contractual and regulatory compliance.

For this reason, we at Nederland, S.A. expect both customers and any of the partners in our value chain to comply with the framework set out in this code, as well as with our own standards, social, risk prevention and environmental practices, and to be an example and driver of our commitment to create a sustainable food chain. In this way, this document is a shared responsibility between Nederland, S.A. and its stakeholders.

A company's value system, based on pre-established principles for doing business, is the first step towards corporate sustainability. Nederland, S.A. has incorporated the **Ten Principles of the UN Global Compact** into its strategies and therefore operates in a way that complies with its core responsibilities in the areas of human rights, labour standards, environment and anti-corruption. Similarly, the company as a member of Sedex, is audited through the **SMETA ethical business model**, based on fundamental pillars such as labour standards, occupational health and safety, environmental assessment and management and ethical business management.



## USE OF THE CODE

As stated above, one of the objectives of this code is to establish principles based on which all company employees should act in the performance of their duties. Therefore, any of the indications, processes and recommendations included in this code are a first reference to be followed in terms of the behaviour of any of our employees in the work environment, both in commercial and non-commercial relations.

When in doubt, in addition to following this code, the employee can always consider the legality of any action or situation, as well as the coherence with the company's policies and values. If, nevertheless, a context arises in which the employees still have doubts about their behaviour in this respect, they will contact the Human Resources team of Nederland, S.A. to explain and share their situation and try to find a way out of his anguish together.

## TERMINOLOGY

The code incorporates expressions such as “internal collaborator” or “external collaborator”. “Internal collaborator” means any professional directly employed by Nederland, S.A. and with operational capacity in the performance of its tasks and objectives. “External collaborator” means any entity or company, as well as its employees, hired by Nederland, S.A. for the development of one or more functions within its operations, as well as other entities and/or companies with which it has commercial or non-commercial relations, The term “collaborator” is understood to mean both the above.



## Responsibilities between people

### HEALTH AND SAFETY AT WORK

At Nederland, S.A. we have a firm and non-negotiable commitment to ensure a safe and healthy working environment for our internal and external collaborators. It's everyone's task to respect this commitment to health and safety through some specific measures:

- Always consider health and safety as a priority in all activities and phases of the business life cycle when performing a task.
- Be aware of their responsibilities in terms of compliance with applicable health and safety regulations, such as always wearing the necessary safety equipment, never disabling the functions of safety equipment and/or systems, and never working under the influence of alcohol, drugs, prescription or non-prescription medication that impairs the ability to drive and/or operate machinery, or under drowsiness.
- In order to acquire this knowledge, it's necessary to attend all mandatory health and safety training and to follow the materials and documents provided by Nederland, S.A. to collaborators regarding health and safety, as well as the materials and documents that third party companies may provide to external collaborators of the company.
- Stop work whenever, for any reason, it's considered dangerous, and immediately report it to a line manager. Similarly, report immediately any accident, injury, illness or dangerous situation and never assume that a third party will report or has already reported a risk, incident or problem related to health and safety. In this respect, both Nederland, S.A. and its external collaborators will always respect the diary and weekly working hours set out in local and national laws.
- Know and respect the operational procedures of the job, encouraging the carrying out of risk assessments, and know the emergency procedures applicable in the workplace.
- The collaborators of Nederland, S.A. will have access to sanitary facilities in an optimal state of hygiene and salubrity, as well as drinking water.
- Similarly, internal collaborators are offered the possibility of receiving regular medial check-ups to ensure, on the one hand, their suitability to carry out the



operations of any job and, on the other hand, to detect any health problems and access the necessary treatment for their cure.

## **MESURES AGAINST HARASSMENT AND/OR DEGRADING TREATMENT**

Bearing in mind the appeal to ethical, professional and non-discrimination principles, it's important to detect, report and act on any case of bullying, abuse, harassment or discrimination that may develop in the workplace or outside the workplace among collaborators.

Some measures against harassment and/or degrading treatment would be:

- Never tolerate any form of bullying or harassment and refuse and refrain from making threatening or obscene comments and/or phone calls, as well as any other form of harassment, verbal or physical.
- Before acting, consider whether our action may constitute discrimination or differential treatment that directly or indirectly affects the physical and/or mental well-being of a collaborator.
- Never cause physical injury to another collaborator (or threaten to do so) or intentionally damage their property or equipment provided by Nederland, S.A.
- Do not use Nederland, S.A.'s computer systems to access inappropriate websites or share inappropriate material. The Internet must be used responsibly and special care must be taken with any information obtained from the Internet, working with reliable sources, avoiding information restricted by law and trying to detect possible fake news or fake content.
- Report cases of bullying and harassment. Never act aggressively to the point of instilling fear of personal, moral or material harm in others. Any collaborator of Nederland, S.A., whether internal or external, has access to the company's [ethical channel](#), which can always be understood as a safe and confidential environment in which to make the necessary reports.



## FAIR AND EQUAL TREATMENT

### Principle 6:

**«Business should support the abolition of discrimination in respect of employment and occupation.»**

All selection and recruitment processes, as well as any commercial or non-commercial relationship development in the work environment, shall be based on professionalism and ethics, always guaranteeing objectivity, transparency, confidentiality and equal opportunities treatment based on ethnic origin, religion, age, disability, gender, marital status or sexual orientation of the people involved in the same.

Respect, especially for differences, diversity and inclusion, should always be the starting point of any working and/or business relationship.

As Nederland, S.A. operates in a multinational and intercultural environment, we recommend all collaborators of the company to inform themselves about local customs that may differ from their own to adapt to them in case of travelling or working in another country, as well as in case of collaborating with people from other countries and cultures in the normal working environment.

## PROCESSING OF PERSONAL DATA

Nederland, S.A. is aware of and complies with the laws relating to the protection of personal data, as well as their collection and use, adopted in recent years within the framework of the European Union. In this respect, the company will take the necessary measures to protect the regulated data, such as personal information, ID card numbers, personal contact details, home addresses, identification of colleagues, former colleagues or job applicants, among others.

Both the company and its collaborators must not share their own personal data that of other collaborators, whether internal or external, with each or with third parties. Such conduct should only be exceeded in the case of: collaborators who are authorised to share such data by virtue of their job functions or the existence of a legitimate business need to do so. In both cases, the collaborator or the company must always ensure through legal consultation that the law is not violated by such action.



## CONFLICTS OF INTEREST, GIFTS AND INVITATIONS

A conflict of interest exists when a collaborator has a competing interest that interferes -or could be perceived to interfere- with his or her ability to make objective business decisions. All collaborators are expected to exercise common sense and avoid situations that could give rise to a conflict (even in appearance), which could be a cause for loss of trust, as well as great personal and corporate reputational damage.

The collaborator of Nederland, S.A. will always make decisions in the best interest of the company. To this end, he/she will always think ahead and proactively deal with any situation that may involve a conflict of interest for him/herself, a third party or the company.

Conflicts of interest are not always clear. If in doubt, always report it to a line manager or members of the Human Resources team ([cpuig@chocoweb.com](mailto:cpuig@chocoweb.com)).

One possible situation in which a conflict of interest may arise is where a collaborator and a family member or friend are involved. For the purposes of this code, a 'family member' is defined as a person with whom the collaborator shares a degree of kinship, whether by blood (father, mother, brother, sister, child, etc.) or by marriage (spouse, brother-in-law, sister-in-law, etc.). In the cases, the possible existence of a conflict should be identified in advance by informing the HR team or a line manager of the situation so that the company can decide whether precautions need to be taken. Some of the conflicts that may arise from such family or friendship relationships include: hiring or compensation decisions; awarding or influencing contracts; cross-approvals, among others.

Another possible situation in which a conflict may arise is in the contexts of a business, employment or market opportunity of which an internal collaborator becomes aware because of his or her position in the company or the nature of his/her work. In this case, Nederland, S.A. encourages its collaborators not to appropriate opportunities that come to their knowledge, and which belong solely and exclusively to the company, and not to share them with third parties.

Involvement in other business or industry activities outside the company could also be a conflict, especially when such involvement involves one-off or fixed remuneration. For this reason, in the event of receiving an offer or promoting a business or industry initiative, the collaborator is expected to inform the company through his or her line manager or the Human Resources team.

The exchange of gifts and entertainment without justification may create -or appear to create- a conflict of interest, especially if it's likely to influence a business decision. In this respect, internal collaborators of Nederland, S.A. must not accept or offer gifts, invitations and other gifts that may affect their objectivity (or that of





the person to whom the gift or invitation is offered) or influence them in a business, professional or administrative relationship.

However, and in accordance with reason and common sense, Nederland, S.A.'s collaborators can be expected to offer and accept only gifts and invitations that are reasonable and customary in a business relationship: small product samples, quantities for personal use of corporate merchandising, invitations to corporate and/or commercial events, among other examples. Under no circumstances shall particularly substantial quantities of any product or gifts in cash or in the form of vouchers with economic value be offered or received. Of course, just as gifts, favours, invitations and personal or business services should not be accepted or offered, they should not be requested or solicited.



## Responsibility to protect information and assets

### PROTECTION OF COMPANY ASSETS AND PROPERTY

The internal collaborators of Nederland, S.A. are responsible for the diligent use of the organisation's assets, whether they are for personal-work or common use. In this sense, the assets of Nederland, S.A. are understood to be work tools, furniture, vehicles, supplies, computer systems and equipment, office equipment, machinery, facilities, intellectual property, contacts, image and reputation, among others.

In this regard, it should be noted that no personal use should be made of the electronic and computer equipment provided by the company, unless direct permission is received from the Analytics team to do so on an ad hoc or perpetual basis. In any case, they must always be used in accordance with applicable laws and regulations.

Intellectual property, as well as copyrights and trademarks involved in any printed or digital material, contract or programme, must always be respected.



## Responsibilities with/in the market

### COMMUNICATION

Nederland, S.A. is committed to transparent, honest and always compliant communication, in all its forms and with all its interlocutors. In this sense, ethics and clarity are two clear values of communication with which Nederland, S.A. is firmly committed. To this end, the company has a Communication department that advises the other areas of the organisation and that sets the communication lines along which all its internal collaborators must work. This department is the contact for the media through the e-mail address [vberras@chocoweb.com](mailto:vberras@chocoweb.com).

Given this already established circuit, it's expected that internal collaborators of Nederland, S.A. will never communicate with journalists except with the authorisation or at the request of the Communication team. In case of requests from journalists or the media, these will be referred to the head Communication manager.

### MONOPOLISATION AND UNFAIR COMPETITION

At Nederland, S.A. we are convinced that the system of free competition is the most enriching for all market players:

The company is committed to never engage in unfair or unethical practices to gain a competitive advantage. Despite the existence of antitrust and regulatory legislation, with which we comply in a non-negotiable manner, it's important that internal and external collaborators of the company take into account certain considerations:

- It's important not to conclude agreements or contracts that include clauses that may involve anti-competitive practices towards third companies, such as price-fixing or market-sharing clauses.
- Do not discuss competitively sensitive information with competitors.
- Not to pass on to competitors or third parties sensitive or privileged information of Nederland, S.A., its business partners, internal or external collaborators.



If an internal or external collaborator detects any of these practices or is involved in a procedure in which any of them are highlighted, we encourage them to report it through the company's ethical channel, in the case of internal collaborators, or through the competent sectoral, commercial or judicial authorities.

## QUALITY

Quality is one of the non-negotiable principles of the business management of Nederland, S.A. Throughout our history we have developed a working system capable of meeting any of the needs presented to us by a client or external collaborator, both nationally and internationally, in accordance with the standards set out in FSSC 22000.

Therefore, Nederland, S.A. expects the same diligence from suppliers and external collaborators in terms of quality, always ensuring maximum compliance with the standards set out by the laws and the different international standards. Likewise, internal collaborators are asked to always act diligently to ensure the highest quality in any action carried out in the working environment, whether in the framework of commercial or non-commercial operation.

In this respect, any partner involved in the supply chain of Nederland, S.A. must be able to demonstrate the traceability of the product to at least one step before and after its action in the supply chain. In this way, the entire supply chain of Nederland, S.A. must ensure the traceability of the products to its origin, which in no case must be related to deforestation or loss of biodiversity. Under this premise, external collaborators involved in the supply chain shall act under due diligence in these terms, especially if local, national or international laws require.

Similarly, in the case of agricultural production partners, it must be ensured that the products used on crops (pesticides, fungicides, etc.) comply with the requirements of the competent local and European authorities. In any case, Nederland, S.A. advocates sustainable primary production in all possible terms and supports the use of good agricultural practices, such as regenerative and/or organic farming, among others.



## Corporate responsibility

### HUMAN RIGHTS

#### Principle 1:

**«Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence.»**

#### Principle 2:

**«Businesses have to make sure that they are not complicit in human rights abuses.»**

In addition to being firmly committed to regulatory compliance and operating in accordance with local, national and international law, Nederland, S.A. is also committed to internationally recognised human rights, to the International Bill of Human Rights and the fundamental rights principles of the 8th convention of the International Labour Organisation (ILO) as set out in the Declaration on Fundamental Principles and Rights at Work.

#### Principle 5

**«Businesses should uphold the effective abolition of child labour.»**



In particular, Nederland, S.A. places special emphasis on the term “child labour”, which refers to work that is mentally, physically, socially and morally dangerous and harmful to children and interferes with their schooling. Any of Nederland, S.A.’s suppliers must ensure that they don’t recruit or use child labour and that they respect and apply the ILO principles on the minimum age for admission to employment and work and on the worst forms of child labour. When employing workers under the age of 18, the supplier of Nederland, S.A. shall always demonstrate that such employment doesn’t not expose them to undue risks that may affect their physical, mental or emotional development, that such employment is undertaken on a voluntary basis and that such employment is not affecting their formative development.

This commitment will be made and developed in all the contexts and countries in which Nederland, S.A. operates, and will also be aligned with the company’s sustainability strategy, which will specify, as it develops, the desire to have a positive impact and collaborate in/with all the communities in which it’s involved.

## **ENVIROMENT AND SOCIAL DEVELOPMENT**

### **Principle 7:**

**«Businesses should support a precautionary approach to environmental challenges.»**

### **Principle 8:**

**«Businesses should undertake initiatives to promote greater environmental responsibility.»**

### **Principle 9:**

**«Businesses should encourage the development and diffusion of environmentally friendly technologies.»**

Nederland, S.A. is strongly committed to working within the framework of the United Nations Sustainable Development Goals. Under this premise, the company will seek to avoid, as far as possible, operational actions that damage the environment or



hinder economic and social development. As a result of this commitment, plans will be created with the aim of reducing and mitigating the effects of such actions, which will include and involve all participants in its supply chain, from suppliers to internal collaborators, as well as customers and public institutions and other external collaborators.

As Nederland, S.A. strives to be a more environmentally and socially responsible company, it also expects its collaborators to avoid activities that may entail and environmental risk; to identify and report any action that may damage the environment or directly impact the social development of the communities in which it operates; and to always act in a conscious manner and taking into account the environmental and social impact they generate, especially in their working environment. In this sense, whenever possible, they are expected to reduce or offset their GHG emissions, to improve their waste and water management, as well as to fully mitigate their impact on biodiversity and the rights of indigenous communities.

## **VOLUNTARY AND DIGNIFIED WORK**

### **Principle 4:**

**«Businesses should uphold the elimination of all forms of forced and compulsory labour.»**

The work carried out by the internal and external collaborators must always be voluntary and dignified, with the understanding that it has no extortive, exploitative, forced or coercive nature, that it's framed within the principles of the Universal Declaration of Human Rights of the United Nations and that's it's remunerated and developed on the basis of local laws, collective agreements and industry standards.

Compensation and benefits provided to collaborators should always be sufficient to cover their basic needs and the contracts governing them may always be terminated voluntarily within the notice period.

We reiterate that the work carried out by Nederland, S.A.'s collaborators must always be carried out with respect for human rights and will never engage in any form of physical, sexual, psychological or verbal abuse, as well as any form of discrimination as described above.



### Principle 3:

**« Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.»**

Collaborators of Nederland, S.A. shall always have the right to freely associate or form trade unions of their own choosing and to bargain collectively for their working conditions in accordance with the law. Nederland, S.A. will in no case discriminate against trade union representatives or prevent them from carrying out their trade union action, nor will it repress collective association by any form of coercion, intimidation or inducement.

### **UNLAWFUL PRACTICES: BRIBERY, MONEY LAUNDERING, EXTORTION AND CORRUPTION**

### Principle 10:

**« Businesses should work against corruption in all its forms, including extortion and bribery.»**

Nederland, S.A., in compliance with the law, prohibits and strictly rejects the making of undue payments in any of the activities of its operations, whether in cash or by means of product, objects, invitations or illegitimate commissions, both to private and public collaborators. Bribery is an unacceptable and inconceivable practice for the company, something that extends to all its collaborators, both internal and external.

It's important that the internal collaborators always act with due diligence, know the business partners and all those agents who are part of its operations and, especially, pay attention to those third parties who may act on behalf of the company. Such third parties should know that they are obligated to act in strict compliance with the rules on Nederland, S.A. and to keep accurate records of all transactions. Similarly, in the event of travel, and when in doubt, unaware or under duress, it's important never to give anything of value or make any payment to public officials in any of the countries in which collaborators operate.

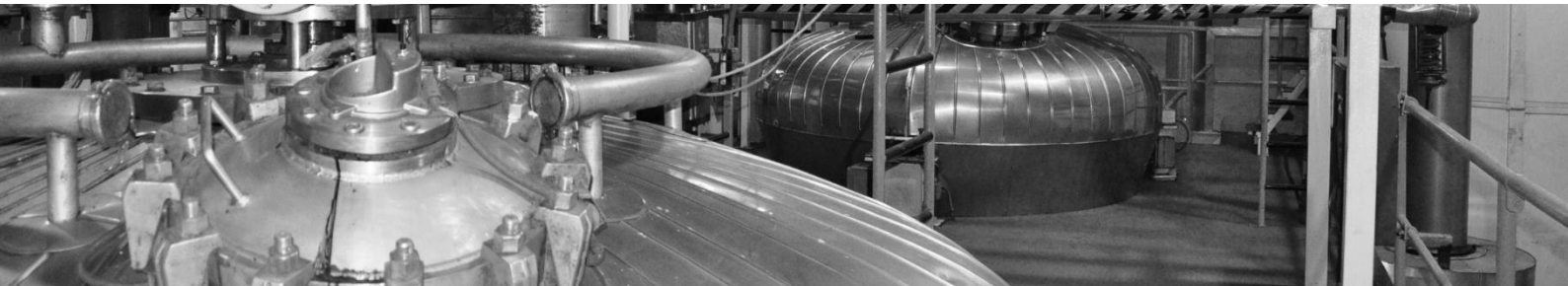
On the other hand, concealing or disguising the origin of illicitly obtained profits, so that they appear to come from legitimate sources, is what is understood to be a



money laundering offence. At Nederland, S.A., we act in compliance with all laws, in transparent manner and with trust as one of the highest standards of our operations.

For this reason, it's important that any collaborator of the company who suspects any irregular financial transactions or activities should report them to the Finance team management or, if appropriate, to the relevant local authorities.

Some of the payments or transactions that may incur a red flag for the collaborators are: payments in cash; payments made in a currency other than that agreed in the invoice or contract; payments made to people or by people who don't appear in the contracts or agreements; payments or debits to bank accounts other than the usual ones or whose purpose is unknown; payments to people, companies or entities located in tax havens, as well as bank accounts opened in branches in tax havens; payments to companies or entities which, due to their legal status, may conceal the beneficiaries that constitute them; extraordinary payments not foreseen in agreements, contracts or company policies; payments made in emergency situations and which are traced through unusual channels or actions.



Internal collaborators, as well as suppliers, customers and other external collaborators of the organisation are obligated to comply with the principles, values and rules described in this Code of Conduct and Good Behaviour and to report any infringement, if detected. To do so, they must report it through the usual channels, the ethical channel shared in this code or via the following e-mail address:

[nederland@chocoweb.com](mailto:nederland@chocoweb.com)

**GENERAL DIRECTOR OF NEDERLAND S.A.**

**RAMON ROVIRA GINESTET**





**Nederland**

BARCELONA 1935

Version revised in 2024 by: Board of Directors, General Management  
and Communication and Sustainability area.