

CODE OF ETHICS AND CONDUCT

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TRACK CHANGES SHEET

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TABLE OF CONTENTS

1. INTRODUCTION.....	4
1.1. TRANSA Identity.....	4
1.2. Scope of application	4
2. OUR VALUES	4
3. CORPORATE VALUES	5
4. PRINCIPLES OF THE CODE OF ETHICS AND CONDUCT	5
4.1. Compliance with legislation	5
4.2. Work ethics.....	5
4.3. Principles for staff action	6
4.4. Corporate image	6
4.5. Conflicts of Interest	6
4.6. Fight against corruption	7
4.7. Transparency	7
4.8. Respect for the environment.....	7
4.9. Work-life balance	8
4.10. Confidentiality and Data Protection.....	8
5. COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT	9
6. ADVERTISING THE CODE	10

	CODE OF ETHICS AND CONDUCT	CEAC Version 1 Page 4 of 10
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1. INTRODUCTION

1.1. TRANSA Identity

TRANSA is a family-owned company established in 1965. It is a leader in the production of tomato concentrates and tomato powder. Since then, it has continued to expand, continuously striving to improve and not only meet but also exceed customer expectations while actively promoting values like sustainability, quality and technological innovation. Its primary goal is sustainable growth and launching new projects to enhance customer relationships, valuing their trust as crucial.

1.2. Scope of application

The Code applies to all TRANSA employees, regardless of their position, level or the nature of their activities, and to all companies where the organisation holds a management interest, regardless of their geographic location.

2. OUR VALUES

PROVEN EXPERIENCE AND REPUTATION. More than 50 years of experience as a transformative agricultural company.

COMMITMENT. We manufacture all our products using the most advanced technology available, optimising the use of our crops.

INTEGRITY. We are dedicated to producing products that meet the highest standards of quality, food safety, and sustainability.

SUSTAINABILITY AND CORPORATE SOCIAL RESPONSIBILITY (CSR). We strive to create economic, environmental and social value, both now and in the long term, enhancing the well-being and real progress of current and future generations. This commitment is demonstrated through our active implementation and promotion of Corporate Social Responsibility initiatives.

INNOVATION. We are continually exploring options to develop new products, enhance quality and food safety, strengthen our identity and sustain growth and profitability.

HONESTY AND TRANSPARENCY. We act with honesty, transparency, and rectitude.

COMMUNICATION. We actively promote ongoing dialogue with our organisation's stakeholders to drive continuous improvement.

TEAMWORK. We approach teamwork with enthusiasm, ensuring effective communication and welcoming diverse perspectives, which allows us to enrich each other's ideas and contributions, ultimately leading to successful outcomes.

	CODE OF ETHICS AND CONDUCT	CEAC Version 1 Page 5 of 10
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TRUST. All members of **TRANSA** conduct themselves ethically in their actions, fostering a sense of tranquillity and satisfaction among our clients.

3. CORPORATE VALUES

Vision: To be a leader and benchmark in the production of processed tomatoes and to establish ourselves as a reliable, solid and innovative company.

Mission: To produce processed tomato products using the most advanced technology available, adhering to the highest standards of quality, food safety and sustainability.

Values: Excellence, ethics, experience, quality, knowledge, effectiveness and enthusiasm.

4. PRINCIPLES OF THE CODE OF ETHICS AND CONDUCT

The corporate values outlined above serve as a reference to guide the conduct of all **TRANSA** employees, which should be rooted in mutual respect for everyone they interact with, a commitment to their work and the company, a responsibility to perform their duties to the best of their abilities and a spirit of solidarity and cooperation with colleagues and the wider society. Additionally, integrity and respect for legality are paramount to ensure that our working environment fosters trust, facilitates personal and professional development and is free from offences, exploitation of any kind, intimidation, harassment and discrimination.

While this Code cannot anticipate every situation that may arise during work, it establishes guidelines to direct employees in their professional behaviour.

All individuals employed by **TRANSA** must adhere to the contents of this Code.

4.1. Compliance with legislation

At **TRANSA**, all our business activities are conducted to the highest ethical standards. Our pursuit of excellence is guided by our corporate values, which assert that achievement comes through diligent work and exceptional quality in the products we produce.

Adherence to applicable laws is integral to our corporate values. This is especially crucial in our compliance with competition law, which not only constitutes sound business practice but also recognises that non-compliance can significantly harm both the company and its employees.

4.2. Work ethics

TRANSA is committed to defending, respecting, and protecting basic labour rights, as well as the human rights and public freedoms outlined in the Universal Declaration of Human Rights.

	CODE OF ETHICS AND CONDUCT	CEAC Version 1 Page 6 of 10
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TRANSA neither directly nor indirectly employs child labour or forced labour and ensures the rights of its employees to freedom of association, opinion and expression, along with the right to collective bargaining.

As a result, **TRANSA**'s respect for labour rights must be reflected in all the professional actions of its employees.

4.3. Principles for staff action

To ensure the commitment and involvement of all employees throughout the production chain, they must be well-informed and made aware of the company's general objectives, as well as any specific goals relevant to their roles.

All employees are expected to act with dedication and efficiency, making rational use of their working hours, which not only contributes to the company's success but also supports their professional and personal growth.

Each employee must take an active role in their professional development by enhancing their skills and continuously updating their knowledge, which they must share with their colleagues.

4.4. Corporate image

TRANSA views its brand, image, and corporate reputation as central components of its corporate image.

As a result:

- All employees must ensure that their actions do not tarnish the image and reputation of **TRANSA**.
- No employee may use the **TRANSA** name or brand for purposes other than those expressly permitted by the company.

4.5. Conflicts of Interest

TRANSA holds loyalty as a core value, which is compatible with employees engaging in other lawful business or professional activities, provided these do not interfere with their responsibilities at **TRANSA**.

As a result:

- **TRANSA** employees must act loyally and defend the interests of the company.
- Employees must avoid any professional or personal activities that could lead to a conflict of interest with their duties at **TRANSA**. They must also refrain from representing the company or influencing decisions in matters where they, their close relatives, or associates have a personal interest.
- Employees who might face a conflict of interest must disclose this to company management before any decision is made regarding the matter, allowing appropriate measures to be taken to safeguard their impartiality.

	CODE OF ETHICS AND CONDUCT	CEAC Version 1 Page 7 of 10
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4.6. Fight against corruption

We reject all forms of corruption. Offering and accepting bribes are illegal, deeply unethical and carry severe consequences for all involved, including potential imprisonment for individuals and substantial fines for the company. We are committed to conducting our operations transparently and with integrity. All our transactions must adhere strictly to anti-corruption laws and regulations, which include maintaining complete and accurate books and records.

General ban on corruption

All forms of bribery are both illegal and unethical. We will thoroughly investigate any allegations of corruption, take disciplinary actions and, where appropriate, pursue legal consequences against those involved.

In compliance with national and regional anti-corruption laws, we must never promise, offer, pay, lend or transfer anything of value to a government agent or official where such a contribution is illegal. This includes not only direct financial contributions but also indirect benefits, such as permitting the official use of company resources or facilities.

Bribery and/or extortion

Bribery and extortion are prohibited under any circumstances. Should any employee encounter bribery or extortion in their professional interactions, whether inside or outside the organisation, they are required to report it immediately. Similarly, if we become aware that a third party associated with the company is being subjected to any form of extortion or bribery, we must report these incidents to management promptly.

4.7. Transparency

The trust bestowed upon **TRANSA** by various stakeholders is rooted in the transparent, accurate and comprehensive information the company disseminates across all areas of its activities. Therefore, all employees are responsible for ensuring that the information they provide is precise, clear and truthful.

4.8. Respect for the environment

At **TRANSA**, harmonising our operations with nature is not only a part of our philosophy but also a priority. We are fully committed to conducting our business activities in an environmentally responsible and sustainable manner, aiming to minimise the impact of our operations.

It is incumbent upon all of us at **TRANSA** to exhibit environmentally correct behaviour and to adhere to and enforce the environmental preservation standards, policies and procedures established by the company. This includes reporting any potential environmental risks.

Furthermore, we actively participate in environmental campaigns and practices in accordance with the company's guidelines.

Additionally, the organisation has established a confidentiality commitment in accordance with this Code of Conduct, which has been signed by all **TRANSA** staff.

	CODE OF ETHICS AND CONDUCT	CEAC Version 1 Page 8 of 10
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Commitment to the community

TRANSA is dedicated to maximising the efficient use of resources at all times and to offering products that meet our customers' ecological expectations. We will collaborate with governments and communities to foster effective mechanisms for environmental improvement and maintain open channels of communication with our employees, suppliers, communities and other stakeholders to keep them informed of our progress. Our company is eager to participate alongside public and private organisations committed to developing plans to maintain ecological balance.

Cost reduction policy based on optimisation of energy and environmental resources

Within the organisation, we have established and widely communicated a cost reduction policy that focuses on the optimisation of energy and environmental resources.

This policy aimed at reducing the cost of energy and environmental resources is based on:

- Reducing consumption of paper and cardboard.
- Reusing and managing plastic packaging properly.
- Ensuring correct disposal and management of fluorescent tubes.
- Implementing effective toner management practices.
- Consuming water responsibly.
- Managing energy use responsibly.
- Adhering to eco-driving guidelines.

These initiatives are documented and supported by our voluntary adherence to ISO 14001:2015 and ISO 50001 certifications.

4.9. Work-life balance

TRANSA recognises that the holistic development of its employees benefits both the individuals and the company. Therefore, we comply and practice measures to achieve a balance between family/personal and professional responsibilities.

Therefore, all employees are expected to respect their colleagues' private lives and support their access to the company's work-life balance initiatives.

Highly valued work-life balance measures among our team include:

- An intensive workday from Monday to Friday for staff outside of production; those who prefer may choose to do a split workday.
- The flexibility to work either from the office or remotely, depending on job suitability and specific situational requirements.

4.10. Confidentiality and Data Protection

TRANSA has established a confidentiality commitment aimed at preserving the confidentiality, integrity and availability of its information. This information is the proprietary asset of the company and is crucial for the development and success of our business.

	CODE OF ETHICS AND CONDUCT	CEAC Version 1 Page 9 of 10
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As a result:

- **TRANSA** employees are responsible for maintaining the confidentiality of information. They must protect the company's information and adhere strictly to the established security protocols and procedures.
- Employees must not use information accessed through their work for any purposes other than those specified by law or contract.
- All information related to **TRANSA's** customers, shareholders, employees, suppliers, strategic plans, and any financial, commercial, production, statistical, legal or similar data must be treated as confidential.
- Data processing must be conducted in a manner that ensures the privacy rights of individuals and complies with applicable personal data regulations.
- All **TRANSA** employees are made aware of and must acknowledge the confidentiality agreement by signing this document.

5. COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

All employees must adhere to the principles and criteria outlined in this Code of Ethics and Conduct.

A designated CSR officer will oversee and monitor compliance to ensure effective implementation and enforcement of its provisions.

OPERATIONAL FRAMEWORK

Any employee who is unsure about the application of the Code or who observes a situation that could involve a breach or violation of the principles, ethical rules or conduct guidelines outlined in this Code should report their concerns to the CSR manager. The CSR manager is tasked with providing advisory support and resolving any complaints regarding non-compliance with the Code.

Queries and complaints can be submitted either verbally or through **TRANSA's** website using the Internal Information Channel.

Each enquiry or complaint should include the following information:

- Identification of the person making the enquiry or complaint, with an option for anonymity if preferred.
- For complaints, a detailed account of the circumstances and, where possible, any supporting evidence. Identification of individuals responsible for any alleged irregularities.
- For consultations, specify the Article of the Code needing clarification and describe the query as accurately as possible.

	CODE OF ETHICS AND CONDUCT	CEAC Version 1 Page 10 of 10
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The CSR manager will address and resolve all complaints and queries received, handling each case as deemed appropriate and acting independently and with utmost respect for all involved parties. This includes maintaining confidentiality throughout the process of addressing these issues.

All employees are expected to cooperate in investigations of potential violations of the Code.

TRANSA undertakes to ensure that no employee will be retaliated against for reporting a breach of the Code of Ethics and Conduct or for participating in any related investigation procedures.

6. ADVERTISING THE CODE

The Code will be made available to all employees in their native languages and published on the **TRANSA** website (www.transa.es). Additionally, we will conduct targeted communications, training and awareness initiatives to ensure its proper understanding and implementation across the organisation.