



Code of Ethics

October 2017



PURPOSE

In keeping with the current regulatory environment, FRIT RAVICH S.L. (hereinafter FRIT RAVICH) has decided to draw up this Code of Ethics in order to maintain and reaffirm the highest ethical standards in the course of the company's business activity.

This document has been created with the aim of serving as a guide and consultation document with regard to the actions of all FRIT RAVICH's employees and partners so as to inspire the Company's daily decision-making and activity.

SCOPE OF APPLICATION

This Code of Ethics is mandatory for all FRIT RAVICH's employees, directors and partners.



ABOUT US

Frit Ravich is a family business founded in 1963 by Josep Maria Viader, its current Chairman, and managed since 1997 by his daughter Judith Viader, who took over the running of the company in order to head the expansion of the business and the development of the brand and distribution.

We are manufacturers of our own brands of crisps, snacks and nuts and distributors of external brands from renowned global companies. We operate in the food, catering, impulse and bulk channels. This dual management model (manufacturing and distribution) enables us to enjoy the best of both worlds, providing value for our consumers and customers.

We operate throughout Spain and in 2015 we set up our first subsidiary in France. We export to countries such as China, Morocco, Chile, Norway, Sweden, Greece and Cyprus, among many others.



VALUES

Frit Ravich's Corporate Culture is based on six values which **define our essence** as a company (Proximity, Endeavour, Customer-Consumer Orientation) and **drive our transformation** and continuous improvement (Transversality, Simplicity, Autonomy)

Proximity.

We are friendly and approachable people. We build ties based on empathy and trust in our relationships. We belong to a family and we feel committed to our culture and the people who form part of it, being there when they need us. We value healthy professionalism which prides itself on collective success.

Endeavour.

We are non-conformist and supremely positive, preferring to ask ourselves how to do things even better. We are demanding in our work and we constantly evolve with effort and enthusiasm. We are flexible in the face of change and rise to new opportunities. We enjoy challenges and new ideas and face them with a proactive attitude.

Customer-consumer orientation.

We listen, ask and adapt to the needs of our customers, consumers and shoppers to enhance our competitive edge. They lie at the centre of every decision we make and every project or strategy we undertake. Service, quality and innovation are our hallmarks for building long-term relationships with them. We guide their shopping and/or consumption experience to make it excellent, without putting them at risk to achieve long-term results

Transversality.

We work towards a common goal relying on and involving everyone. Collective benefit stands above individual profit and that of the company stands above that of the role, as a result of which we share resources and solutions for the sake of the organization. We look at the whole picture before making decisions and we focus on involving the people required in an area and communicating with them.

Simplicity.

We eliminate the superfluous and focus on what brings value to the whole. We approach challenges by prototyping and searching for streamlined, scalable solutions. We question the concept of "we've always done it like that" and we quickly provide alternatives. We simplify by taking into account interdependence and prioritize safety, quality and customer experience.

Autonomy.

We take action to resolve a problem or address an opportunity. When faced with a problem we present the solution instead of the complaint. We assume our responsibility and learn from our mistakes, which helps us to improve. We encourage our people's participation in decision-making and we encourage leadership by distributing projects, because this takes us further and faster.

1 Compliance with legality

All FRIT RAVICH's employees and managers must comply with current legislation and the Company's internal standards, as well as this Code of Ethics.

2 FRIT RAVICH and its employees

FRIT RAVICH's employees and managers shall maintain a working environment that fosters the full development of all its professionals. Respect for the people's dignity, trust and cordiality must therefore prevail.

FRIT RAVICH undertakes to prevent and punish any manifestation or conduct which is deemed to be violent or constitute an abuse of authority, harassment or intimidation.

Harassment or intimidation means any unwanted behaviour whose purpose or consequence is to threaten people's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment.

For their part, FRIT RAVICH's employees, directors and partners undertake to prevent and report any conduct liable to cause harassment or intimidation.

3 Confidentiality

Personal information. FRIT RAVICH undertakes to respect the reserved and confidential nature of the personal information provided by its employees within the framework of their labour relations, as well as to preserve its integrity and confidentiality in accordance with the current regulations on data protection.

Personal data. The company undertakes not to disclose the personal data of its employees, suppliers or partners, except with the express consent of the interested parties or when such disclosure is stipulated by the current regulations, as in the cases of judicial or administrative requirements. On no account may employees' personal data be processed for purposes other than those legally or contractually envisaged.

Confidential information. The employees of FRIT RAVICH who, due to their activity, gain access to the Company's confidential information undertake to keep it secret.

Similarly, employees and partners are bound to maintain the strictest confidentiality and obligation of secrecy with respect to any confidential or sensitive information they may obtain regarding the companies or entities at which they have previously performed their work.

These undertakings will remain in force following the termination of their employment with FRIT RAVICH.

In the event of the termination of a labour or professional relationship, any reserved or confidential information will be returned by the employee, including the media in which it is stored.

Confidential documents. FRIT RAVICH's employees will keep confidential documents in the appropriate conditions to guarantee their confidentiality.

Reproduction of or access to a confidential document must be expressly authorized by the person responsible for the document in question.

FRIT RAVICH's employees and partners must notify the recipients of the reproductions or copies of confidential documents of the prohibition to make copies of them.

4 Proper use of computer resources

Computer resources and tools. FRIT RAVICH provides its employees and partners with the resources and tools necessary for conducting their activity, as well as the mechanisms for the suitable safeguarding thereof.

The Company's employees and partners undertake to **use the resources owned by FRIT RAVICH in a responsible manner**, using them responsibly and using them solely for professional purposes.

Similarly, all FRIT RAVICH's employees will obey the specific corporate rules and procedures regarding the Company's resources and tools.

Proper use of computer resources.

There is no expectation of privacy in the use of the computer resources and tools provided to employees for the performance of their duties. Therefore, their use and the information contained in them **is liable to be reviewed by FRIT RAVICH** in the exercise of its supervisory power.

FRIT RAVICH's employees should be aware that the use of the resources and tools placed at their disposal entails acceptance of these conditions.

Intellectual and industrial property. FRIT RAVICH's employees should be aware that the Company owns the existing intellectual and industrial property rights to the programs, computer systems, devices and other resources. Therefore, FRIT RAVICH's employees and partners undertake **not to operate or use the Company's computer systems and applications for purposes other than** those stipulated in this Code in any manner.

Similarly, the employees will not install third-party programs or applications or use them in the computer resources provided by the Company if they infringe intellectual property rights or rights of any other nature, or others which are liable to damage said resources or harm the interests of FRIT RAVICH or third parties related to the Company.

5 Accounting and invoicing

FRIT RAVICH guarantees the **truthfulness** and **transparency** of the Company's **financial information**, in accordance with the accounting principles stipulated in the national and international standards.

Similarly, the Company's employees and directors undertake to obey FRIT RAVICH's internal rules on invoicing, payments and reimbursements.

6 Commitment to the environment

To act preventively and actively to reduce any potential environmental impact our activity might cause and to promote the following chief areas of action:

- Reductions in resource consumption, emissions and waste.
- Increases in reuse and recycling and the promotion thereof.

7

Conflicts of interest

FRIT RAVICH's directors, employees and partners must **protect the Company's interests** and safeguard and vouch for its good reputation, refraining from acting against its interests.

Consequently, FRIT RAVICH's directors, employees and partners will not conduct any activity or perform any transaction in which their personal interests prevail over the Company's interests.

In order to prevent potential conflicts of interest, any **directors, employees and partners** who, within the framework of a certain activity or transaction, **find themselves in a real or potential situation of conflict of interest, should immediately report said situation to the Ethics Committee** so that it can inform them how to proceed.

8

Prevention of corruption and other improper and unlawful conduct

At FRIT RAVICH **the giving and receiving of gifts is restricted** and gifts whose purpose is **bribery** or any which are intended to influence their recipients so that they make decisions compromising their impartiality and good judgement are **forbidden**.

Under no circumstances is it permitted to give presents, gifts, personal benefits or financial compensation to public servants and employees, whether they be nationals or foreigners, leaders of political parties, people in public positions or candidates for such positions.

9 Compliance with the code of ethics

The content of **this Code of Ethics is mandatory** for FRIT RAVICH's administrators, directors, employees and partners.

In this respect, FRIT RAVICH has appointed an Ethics Committee, to which it has entrusted, among other duties, the regular verification of effective compliance with this Code.

Conduct contrary to the principles contained in this Code of Ethics, as well as in the other internal regulations in force at the Company, will result in the application of the corresponding penalty system, in accordance with the seriousness of the breach and within the applicable legal framework, pursuant to the Workers' Statute and the applicable Collective Agreements.

Similarly, FRIT RAVICH's administrators, directors, employees and partners **undertake to identify and report to the Ethics Committee any inappropriate or improper conduct** liable to violate the content of this Code or the Company's internal regulations, regardless of whether they entail a benefit or harm for FRIT RAVICH.

For this purpose, FRIT RAVICH's Ethics Committee has enabled a **whistle-blower channel** for all the directors, employees and partners via the following e-mail address: comiteetico@fritravich.com

The complaints must be identified and will provide details of the events which have occurred. On no account will the identity of the complainant be disclosed to the accused party, and there will be no reprisals of any kind against the complainant, unless there is evidence of the former's malicious intent or intention to cause harm to the reported party.

FRIT RAVICH undertakes to process this data in the strictest compliance with the legislation on personal data protection.



DO YOU HAVE ANY QUERIES?

Remember that if you have any queries about the interpretation and/or application of the content of this Code of Ethics, you can directly contact FRIT RAVICH's Ethics Committee by sending your questions to the following email address: comiteetico@fritravich.com