

CODE OF ETHICS



Update January 2026

WHO WE ARE

FRIT RAVICH is a family business founded in 1963 by Josep Maria Viader, our current chairman, and it has been run since 1997 by his daughter, Judith Viader, who took up the reins of the company, leading the expansion of the business, brand development and distribution.

We are producers of crisps, snacks and nuts under our own brand and distributors of the main national and international food brands. This dual management model (manufacture and distribution) enables us to make the most of both worlds, providing value to consumers and customers.

We operate in the food, catering, impulse-buy and bulk-product industries. 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 others.

FRIT RAVICH 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 our relationships. We belong to a family, and we feel committed to our culture and the people who are 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 are at the heart 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 organisation. We look at the whole picture before making decisions, and we focus on involving the people required in an area and communicating with them.

AUTONOMY

We take action to solve 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.

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 prioritise safety, quality and customer experience.

PURPOSE

FRIT RAVICH has developed this Code of Ethics as an expression of its commitment to compliance with current legislation, business ethics, responsible practice, social responsibility and good corporate governance.

For the purposes of this Code, FRIT RAVICH refers to both FRIT RAVICH S.L. and its subsidiary FRIT RAVICH FRANCE S.A.S.

This document has been created with the aim of serving as a guide and consultation document with regard to the actions of all people to whom this Code applies, promoting responsible decisions and the ethical performance of their duties in the company's daily activities.

The Code of Ethics is the highest-level regulatory instrument within FRIT RAVICH's internal compliance system, and it establishes the general principles that should guide the professional behaviour of those who carry out their activity in the company. These principles are developed and implemented through corporate policies, rules and procedures that regulate the different

scopes of operation.

Compliance with the Code of Ethics is mandatory, and failure to comply may result in the adoption of appropriate measures, in accordance with applicable regulations, internal procedures and, where appropriate, applicable contractual terms and conditions.

SCOPE OF APPLICATION

This Code of Ethics is mandatory and applies in the following areas:

PEOPLE

The Code of Ethics applies to all FRIT RAVICH's employees and directors, as well as external parties that provide services at its facilities, regardless of their position, function or level of responsibility (hereinafter, "People linked to FRIT RAVICH").

ACTIVITY

The Code of Ethics applies to all activities carried out by FRIT RAVICH and should guide professional conduct in the exercise of the duties and responsibilities taken on within the framework of business activity.

GEOGRAPHICAL SCOPE

This Code of Ethics applies in all national and international territories where FRIT RAVICH carries out its activities.

Business partners and other third parties with which **FRIT RAVICH** maintains commercial relationships are not included within the direct scope of this Code of Ethics. However, the company will promote, to the extent possible, that these third parties act in accordance with the principles and values contained herein.

To this end, FRIT RAVICH will establish appropriate mechanisms—such as specific contractual clauses, third-party codes of conduct or other equivalent instruments—with the aim of extending the application of these principles throughout its value chain, fostering responsible practices aligned with the company's ethical standards.

GUIDING PRINCIPLES

Act with integrity and comply with the law

Compliance with the law

FRIT RAVICH's commitment

FRIT RAVICH carries out its activity in strict compliance with current legislation



and internal regulations applicable in all territories in which it operates. Respect for the law is an essential and non-waivable principle that guides the company's actions, regardless of the function, level of responsibility or location of the people who are part of it.

Furthermore, FRIT RAVICH expects its business partners to act in accordance with the law and equivalent ethical principles, promoting a culture of compliance throughout its entire value chain.

What is expected of People linked to FRIT RAVICH?

All People must be aware of and respect the laws and regulations that affect their scope of activity, as well as the company's internal policies, procedures and rules, and they must always act with diligence, honesty, responsibility and integrity in the performance of their duties.

No instruction, pressure or circumstance may justify non-compliance with the law, this Code of Ethics or any other internal procedures and policies of FRIT RAVICH. In the event of any doubt regarding the legality or correctness of an action, guidance and clarification should be requested before proceeding, from a hierarchical superior or, where appropriate, using the available internal channels.

Prevention of Corruption and Other Unlawful Conduct

FRIT RAVICH's commitment

FRIT RAVICH maintains a firm commitment against corruption, bribery, fraud, money laundering, irregular financing and any other conduct aimed at obtaining undue benefits. The company expressly rejects obtaining undue advantages through practices contrary to legality, ethics or the principles of transparency and fairness that govern its activity.

Within this framework, FRIT RAVICH promotes professional relationships based on integrity, professionalism and transparency, in both the public and private spheres, and it adopts the necessary measures to prevent and detect conduct related to corruption in the course of its activity.

Furthermore, the company guarantees that its economic, financial, tax and accounting information accurately and completely reflects its situation and operations, maintaining adequate and reliable records in accordance with current regulations.

What is expected of People linked to FRIT RAVICH?



People linked to FRIT RAVICH are expected not to directly or indirectly offer, promise, solicit or accept payments, gifts, favours, personal benefits or any other advantage, economic or otherwise, that is intended to unduly influence professional or business decisions, alter impartiality in decision-making or conceal illicit practices.

Giving and accepting gifts, business courtesies or any other benefit must always be carried out in accordance with the provisions of the company's internal regulations and, in particular, the Anti-Corruption Policy, which sets out the applicable criteria, limits and procedures.

Any courtesies, gifts or benefits that are intended or may be interpreted as being intended to unduly influence decisions, compromise independence of judgment or violate applicable internal or external regulations are prohibited.

Business courtesies will only be admissible when they are reasonable, proportionate, transparent and in accordance with current law and the Anti-Corruption Policy.

People linked to FRIT RAVICH must act with integrity in their relationships with public authorities, customers, suppliers, business partners and other stakeholders, and they must communicate through the established internal channels any situation that may pose a risk or indication of corruption or other illegal conduct.

They must manage and record the corresponding economic operations, ensuring that collections, payments and transactions are carried out in accordance with applicable regulations and internal procedures and refraining from any practice intended to conceal information or evade controls.

Conflicts of interest

FRIT RAVICH's commitment

FRIT RAVICH protects its legitimate interests and reputation and establishes the necessary mechanisms to prevent, identify and properly manage situations of conflict of interest that may arise in the course of its business.

The company respects that People linked to FRIT RAVICH may participate in other professional, business or financial activities, provided that such activities do not conflict with the interests of the company or compromise, or be

perceived as compromising, their objectivity, independence or impartiality in decision-making.

Conflicts of interest occur when personal, family or economic interests can directly or indirectly influence the performance of professional responsibilities, affecting the impartiality with which decisions must be made within the company.

The company promotes a culture of transparency and objectivity in decision-making, with the aim of preventing personal, family or economic interests from directly or indirectly influencing professional decisions.

What is expected of People linked to FRIT RAVICH?

Directors, employees and those providing services to FRIT RAVICH are expected to act with objectivity, independence and impartiality in defence of FRIT RAVICH's interests and to avoid any activity, operation or transaction in which their personal, family or economic interests may prevail, or appear to prevail, over the interests of the company.

People linked to FRIT RAVICH must identify and avoid situations of conflict of interest. If these cannot be avoided, they must act in accordance with the company's internal regulations and, in particular, the Anti-Corruption Policy.

Likewise, any situation of conflict of interest must be reported to the Ethics Committee, in accordance with the provisions of the company's internal regulations.

Protection of Free Competition

FRIT RAVICH's commitment

FRIT RAVICH competes in the market in a fair and responsible manner, respecting competition law and rejecting any practice that may restrict, distort or otherwise undermine free competition.

The company does not participate in agreements, concerted practices or exchanges of information that have the purpose or effect of limiting competition, such as price fixing, market or customer sharing, bid or tender rigging or any other conduct that could restrict, distort or otherwise undermine free competition. Relationships with competitors, customers and suppliers are built in accordance with the principles of fair competition, maintaining transparency, independence and professionalism in all business interactions.

What is expected of People linked to FRIT RAVICH?



All People linked to FRIT RAVICH are expected to exercise particular diligence in this scope and avoid any behaviour that could pose a risk to the company or violate competition law.

In particular, they must refrain from participating in conversations, agreements or exchanges of information with competitors, as well as agreements with customers or suppliers that constitute or may constitute practices prohibited by competition law, always acting in accordance with the established internal rules and procedures.

If there is any doubt about the lawfulness of a conduct or exchange of information, People must refrain from acting and seek guidance through the established internal channels.

Respect people and foster a fair work environment

Respect for Human and Labour Rights

FRIT RAVICH's commitment

FRIT RAVICH commits to ensuring all people are treated with respect and dignity, upholding human and labour rights in accordance with the main international conventions and standards.

The company promotes a work environment based on respect, inclusion, fairness and trust, acting at all times in accordance with applicable regulations and the principles set out in its internal regulations and, in particular, in the FRIT RAVICH Human Rights Policy. Furthermore, FRIT RAVICH expressly rejects any form of child labour, forced labour, servitude or human trafficking, in both its own operations and its value chain, and it encourages that its relationships with business partners develop in alignment with these principles, fostering respect for and protection of human and labour rights.

What is expected of People linked to FRIT RAVICH?

All People are expected to act respectfully and responsibly in their professional relationships, treating others with dignity and avoiding any conduct that may be offensive, abusive or contrary to human or labour rights.

People linked to FRIT RAVICH must act in accordance with the principles of respect, equality and non-discrimination, contributing to a suitable work environment aligned with the company's values.

They must also act in accordance with internal regulations on human and labour rights, in particular with the provisions of FRIT RAVICH's Human Rights

Policy, as well as use the internal channels enabled to communicate any situation that may involve a breach of these principles.

Equal Opportunities and Non-Discrimination

FRIT RAVICH's commitment

FRIT RAVICH guarantees equal opportunities in access, development and career advancement for all people and rejects any form of discrimination in the workplace.

Likewise, FRIT RAVICH promotes professional development and continuous learning as key elements for the growth of People and the organisation, in accordance with objective criteria and in alignment with the company's internal regulations.

The company encourages an inclusive, diverse and respectful work environment, based on equal treatment and opportunities, in accordance with applicable regulations and its internal policies.

What is expected of People linked to FRIT RAVICH?

People are expected to act in a respectful and professional manner, avoiding any discriminatory conduct based on gender, age, origin, nationality, disability, sexual orientation, gender identity, religious beliefs, ideology, marital status, social condition or any other personal or social circumstance protected by current law.

People linked to FRIT RAVICH must act in accordance with the principles of equality, respect and inclusion, refraining from any behaviour that may violate them.

They must also comply with the applicable internal regulations on this matter and use the internal channels enabled to communicate any situation that may involve a breach of these principles.

Occupational Health and Safety

FRIT RAVICH's commitment



FRIT RAVICH considers occupational health and safety a fundamental principle and a priority in the carrying out of its activity. The company integrates occupational risk prevention into all its processes and adopts the necessary measures to foster safe and healthy working environments, protecting the physical and mental integrity of individuals.

Furthermore, FRIT RAVICH promotes training, information and awareness in health and safety matters, and it provides individuals with the appropriate resources to ensure safe working conditions, in accordance with applicable and internal regulations.

What is expected of People linked to FRIT RAVICH?

All People linked to FRIT RAVICH are expected to comply with the rules, procedures and instructions regarding occupational health and safety and to act responsibly in the performance of their duties, actively contributing to risk prevention.

They must also comply with internal regulations on occupational health and safety and act in accordance with the prevention and protection principles established by the company.

Furthermore, they must use the internal channels enabled to communicate any situation that may pose a risk or non-compliance in this matter.

Protecting the company's information and assets

Privacy and Confidentiality

FRIT RAVICH's commitment

FRIT RAVICH commits to protecting the privacy of People and the confidentiality of corporate information, guaranteeing its responsible, secure treatment in accordance with current regulations and the company's internal policies.

Privacy and personal data protection apply to employees, customers, suppliers and third parties, ensuring that their information is collected, used and stored only for legitimate purposes, respecting the rights of data subjects and the corresponding legal obligations.

The confidentiality of corporate information includes strategic, financial, technical or commercial information, which must be protected against unauthorised access, loss, disclosure or misuse.

What is expected of People linked to FRIT RAVICH?



All individuals are expected to use personal data and confidential corporate information responsibly, confidentially and solely for the performance of their professional duties, respecting at all times applicable regulations and established internal procedures and policies. In particular, People linked to FRIT RAVICH must:

Act in accordance with internal regulations on data protection and confidentiality, ensuring the proper use and protection of the information to which they have access.

Use the internal channels enabled to communicate any situation that may pose a non-compliance or incident in this matter.

Responsible use of company resources and assets

FRIT RAVICH's commitment

FRIT RAVICH provides employees and collaborators with the necessary resources and assets for the performance of their professional activity and adopts appropriate measures for their protection and safeguarding. These resources include both tangible and intangible assets, including computer systems.

The company establishes rules and procedures to ensure responsible, efficient and safe use of its resources, in accordance with current and internal regulations.

What is expected of People linked to FRIT RAVICH?

All People are expected to use FRIT RAVICH's resources and assets responsibly, efficiently and exclusively for professional purposes, respecting at all times applicable corporate rules and procedures.

People linked to FRIT RAVICH must make proper use of the company's resources and assets, in accordance with applicable internal regulations, avoiding any misuse that may cause harm to the company or to third parties.

They must also act in accordance with internal policies regarding the use of the means and systems made available to them, and they must use the internal channels established to report any misuse or incident in this matter.

Cybersecurity and protection of information



FRIT RAVICH's commitment

FRIT RAVICH considers cybersecurity and protection of information essential elements to guarantee the confidentiality, integrity, availability and proper use of information, as well as the continuity of its business activity.

The company adopts technical and organisational measures aimed at preventing, detecting and responding to information security threats and risks, including unauthorised access, cyberattacks, data loss or misuse of corporate systems.

Consequently, FRIT RAVICH will promote a cybersecurity culture based on prevention, awareness and shared responsibility, establishing controls, policies and monitoring mechanisms that allow for the adequate protection of the company's information and digital assets.

What is expected of People linked to FRIT RAVICH?

Cybersecurity is a shared responsibility. Consequently, all People linked to FRIT RAVICH play an essential role in protecting digital assets and information, requiring a diligent, responsible and committed attitude in the use of systems and in data management.

Any suspicion, incident or vulnerability related to information security must be reported through the channels established by FRIT RAVICH to allow for proper management and response.

Responsible use of generative AI

FRIT RAVICH's commitment

FRIT RAVICH recognises the potential of generative AI as a tool to support innovation, efficiency and process improvement, provided that its use is carried out responsibly, safely and in line with the company's guidelines.

FRIT RAVICH will promote a supervised and safe use of generative AI, establishing the necessary guidelines and controls to ensure that its adoption is carried out responsibly and in line with current law and internal regulations.

What is expected of People linked to FRIT RAVICH?

People linked to FRIT RAVICH must make responsible, ethical, safe and proportionate use of the generative AI tools that the company makes available to them or expressly authorises for the performance of their professional activity.

The use of these tools should be geared towards improving efficiency, work quality, innovation and support for decision-making, without replacing professional judgment, individual responsibility or internal controls established by the company.

Intellectual and Industrial Property

FRIT RAVICH's commitment

FRIT RAVICH protects and respects intellectual and industrial property rights, both its own and those of third parties, as an essential part of its assets and business activity.

The company establishes the necessary measures to ensure the proper use of its trademarks, trade names, designs, content, documentation, software, technical know-how, processes and other intangible assets, in accordance with applicable regulations and current contractual agreements.

What is expected of People linked to FRIT RAVICH?

People are expected to respect at all times the intellectual and industrial property rights of FRIT RAVICH and third parties and to refrain from using, reproducing, distributing, communicating or modifying protected content without the proper authorisation or licence.

Furthermore, they must not introduce into the company's systems materials, content or applications that infringe third-party intellectual or industrial property rights.

Any creation, development, innovation or material generated in the performance of professional activity or through the use of company resources will be understood to have been made within the framework of the relationship with FRIT RAVICH and for its benefit.

In the case of employees, the ownership of said creations will belong to FRIT RAVICH under the terms provided for in current law and in the applicable employment contracts.

In the case of suppliers providing services at FRIT RAVICH facilities, ownership and rights of use of the creations will be governed by the applicable regulations and the contractual agreements signed with the company.

Act with rigour and social responsibility

Transparency

FRIT RAVICH's commitment

FRIT RAVICH commits to managing and communicating information responsibly, transparently and in accordance with integrity criteria, based on the information available at any given time and acting with due diligence. This principle is especially relevant in financial, tax, accounting and sustainability matters, and it is applied consistently in all relationships, including customers, suppliers, authorities and other stakeholders.

What is expected of People linked to FRIT RAVICH?

People linked to FRIT RAVICH are expected to act with rigour, honesty and responsibility in the preparation, use and communication of information related to their professional activity, on the basis of the information available at any given time and acting in good faith, while avoiding conduct intended to mislead or unjustifiably conceal relevant information.

People must ensure that the information they provide in the performance of their duties is consistent with the reality of the company and conforms to established internal procedures and controls, properly communicating any errors, omissions or relevant incidents of which they become aware.

Food Safety and Quality

FRIT RAVICH's commitment

Food safety and product quality are essential and non-negotiable commitments of FRIT RAVICH and represent the basis of trust of customers, consumers and other stakeholders. The company carries out its activity with the aim of ensuring that all products strictly comply with applicable regulations and the internal quality and food safety standards defined by the organisation.

FRIT RAVICH applies prevention, control, traceability and continuous improvement systems throughout the entire value chain, from the selection and approval of raw materials and suppliers to the manufacture, storage, distribution and marketing of products, and it promotes a culture of food safety and quality based on responsibility, transparency, rigour, communication and consumer protection.

What is expected of People linked to FRIT RAVICH?



People linked to FRIT RAVICH must act with diligence, responsibility and commitment in the performance of their duties, complying with the procedures, protocols, instructions and controls established in matters of food safety and quality.

They must also:

- guarantee compliance with best hygiene and food safety practices;
- ensure the correct traceability and management of products;
- actively collaborate in internal audits, inspections and investigations; and
- immediately report any deviation, risk, incident or conduct that may compromise product safety, legality, quality or customer and consumer confidence.

FRIT RAVICH will not tolerate negligent actions, concealment of incidents or non-compliance that may jeopardise food safety or its products' integrity.

Contributions to Charitable Organisations and Sponsorships

FRIT RAVICH's commitment

FRIT RAVICH maintains a responsible commitment to society and the communities in which it operates, and it supports social, cultural or solidarity initiatives that are aligned with its values and business activity.

Contributions to charities and sponsorships are made in a transparent and ethical manner and in accordance with applicable regulations, ensuring that they have a legitimate purpose and are not directly or indirectly used to obtain undue advantages, influence business or institutional decisions or conceal practices contrary to the law or this Code of Ethics.

Furthermore, the company establishes the necessary procedures for the proper assessment, authorisation and registration of donations and sponsorships in accordance with current regulations, ensuring the traceability of funds and the proper use of resources.

What is expected of People linked to FRIT RAVICH?

People linked to FRIT RAVICH are expected to act responsibly and transparently in relation to any donation or sponsorship initiative, respecting at all times applicable regulations and established internal procedures.



People must not promote, authorise or participate in contributions or sponsorships that could be used to gain undue advantages or that do not serve a legitimate purpose. Any action within this scope must be carried out in accordance with the corresponding channels and authorisations.

Commitment to Society and the Environment

FRIT RAVICH's commitment

FRIT RAVICH carries out its activity with a firm commitment to society and respect for the environment, integrating criteria of social responsibility and sustainability into its decisions and the management of its business activity.

The company works towards minimising the environmental impact of its operations, promoting the efficient use of resources, the reduction of emissions and waste and the continuous improvement of its processes, in accordance with applicable regulations and its sustainability commitments.

Furthermore, FRIT RAVICH contributes to the social and economic development of the communities in which it operates, maintaining responsible and transparent relationships with its stakeholders and acting in accordance with its corporate values. This commitment is part of the company's strategy and is continuously reviewed with the aim of generating a positive and sustainable long-term impact.

What is expected of People linked to FRIT RAVICH?

People linked to FRIT RAVICH are expected to act responsibly and consistently with the company's social and environmental commitments in the performance of their duties.

People must contribute to the efficient use of resources, respect applicable environmental rules and procedures and act responsibly in their relationship with the community and stakeholders, avoiding behaviours that may generate negative social or environmental impacts.

MONITORING AND CONTROL MODEL

1. Ethics Committee and Channel

In order to ensure the correct application and effective compliance with the Code of Ethics and the rest of the internal regulations, FRIT RAVICH has established an Ethics Committee, which is responsible for, among others, the following functions:

- Monitor compliance with the Code of Ethics and promote its correct application and interpretation



- Analyse those situations or behaviours that may constitute a breach of the principles and rules contained in the Code of Ethics
- Propose, where appropriate, the measures that may be necessary for the proper management of non-compliance, in accordance with internal regulations and applicable law
- Contribute to the dissemination of the company's ethical principles and to the promotion of a culture of integrity and compliance

Likewise, FRIT RAVICH provides People linked to FRIT RAVICH, as well as other stakeholders, with an Ethics Channel or Whistleblower Channel, with the aim of facilitating the reporting of possible irregularities, breaches of current law or internal company regulations.

The Ethics Channel has been implemented through a technological platform managed by an external supplier. The Ethics Channel is governed by the principles of independence, impartiality, confidentiality, traceability, objectivity and absence of retaliation, guaranteeing a secure and accessible information system.

Users of the Ethics Channel may report, in good faith, possible breaches and have the right to the protection of their identity, to the confidentiality of the reported information and not to suffer retaliation due to its use. People that use the Ethics Channel will enjoy the protection guarantees provided for in the applicable regulations, in particular those established in Directive (EU) 2019/1937 and Law 2/2023 of 20 February on the protection of persons who report regulatory infringements, as well as in the rest of the applicable law.

The people responsible for managing the Ethics Channel will act with independence, objectivity and confidentiality, ensuring the proper handling of communications, the protection of the rights of all parties and the secure custody of information.

The Ethics Channel is available at the following link:
<https://fritravich.canaldenunciasanonimas.com/home>

For inquiries or questions regarding the interpretation of the Code of Ethics, the operation of the Ethics Channel or internal regulations, you can contact the Ethics Committee via email: comiteetico@fritravich.com

2. Commitment to and acceptance of the Code

This Code of Ethics is mandatory and applies to all People linked to FRIT RAVICH, who must be aware of it, understand it and act in accordance with the principles and standards of conduct contained herein.



This Code of Ethics is applicable and mandatory for all People linked to FRIT RAVICH from the moment it is communicated to them. However, express acceptance of the Code of Ethics may be required as a declaration of the commitment to act in accordance with the principles and rules contained herein, without the absence of such acceptance exempting one from compliance.

In the event that the Code of Ethics is subject to relevant amendments or updates, these will be duly communicated to the People to whom it applies, through the means established by the company.

FRIT RAVICH will promote awareness of the Code of Ethics and provide the necessary means for its proper understanding. Once communicated and made available, the lack of awareness of its content does not exempt one from compliance.

3. Disciplinary sanctions

Failure to comply with the principles and standards of conduct established in this Code of Ethics, as well as with the rest of FRIT RAVICH internal policies and regulations, may result in the adoption of the corresponding corrective, disciplinary or contractual measures, according to the seriousness of the facts and the circumstances involved.

In the case of People subject to an employment relationship, the application of these measures will always be carried out in accordance with the current law, the Workers' Statute and the applicable Collective Agreements, guaranteeing in all cases the principles of proportionality, objectivity and the right to defence.

When dealing with external parties that maintain a professional or contractual relationship with FRIT RAVICH, the measures adopted will comply with the provisions of the applicable regulations and the corresponding contractual agreements, notwithstanding any legal actions that may be appropriate.

The possible sanctions are understood to be without prejudice to any legal or administrative liabilities that may arise from the events.

4. Communication, dissemination and updating of the Code

FRIT RAVICH undertakes to disseminate this Code of Ethics among all individuals to whom it applies and to make it available as a reference document on professional conduct and business ethics.

The company will guarantee regular training on ethics, compliance and the principles of the Code of Ethics to all individuals in the organisation. This training will become part of the onboarding process at the beginning of the

employment or contractual relationship and will be carried out on a recurring basis, with the aim of ensuring awareness, comprehension and effective application, covering all groups within the organisation.

FRIT RAVICH will also promote complementary communication and awareness-raising actions that reinforce the ethical culture and compliance with the principles set out in the Code.

The Code of Ethics will be subject to regular review and updating, in order to adapt it to any regulatory, organisational or contextual changes that may occur, as well as to incorporate improvements derived from experience in its application. The approved amendments will be duly communicated and, where appropriate, will require express acceptance.