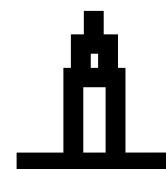
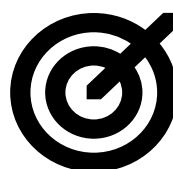
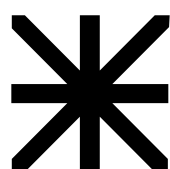


HR **HIJOS**
DE RIVERA

INDEX



Introduction	4
Global Commitment	5
Aim	5
Scope of application	5
Ethics Committee	6
Dissemination and acceptance	8
Ethical Behaviour	9
A. In relation to suppliers and customers of the Company	9
1. Objectivity, transparency and diligent action	9
2. Suppliers subject to special due diligence	10
3. Prevention of money laundering	10
4. Duty of confidentiality and professional secrecy	10
B. In relation to competitors of the Company	11
1. Respect towards free competition	11
2. Market behaviour	11
C. In relation to personnel of the Company	12
1. Conflicts of interest	12
2. Confidential information	13
3. Asset protection	14
4. Crime and fraud prevention	14
5. Discrimination and harassment	14
6. Corporate image and reputation	14
7. Recruitment, professional development, and employees training	15
8. Employee participation, social dialogue	15
9. Occupational health and safety	15
D. In relation to society	16
1. Respect towards institutions and the principle of impartiality	16
2. Commitment and social responsibility	16
3. Commitment to environmental protection	16
E. In relation to Public Administration	17
Compliance	19
Reporting channel	21
Other aspects	22
Validity, review and update	23



INTRODUCTION

WHY DO WE NEED A CODE OF ETHICS?

The secret of the success of our business group lies in the tireless pursuit of excellence, prioritising the maintenance of our project in the medium and long term, over and above the desire for immediate enrichment.

We are committed to a way of doing things under demanding criteria of integrity, respect, responsibility, sustainability and ethical behaviour, which have accompanied us throughout our history and which, without doubt, are essential when valuing the people who are part, or could be part, of any of our companies.

The importance of safeguarding these solid values has been transmitted to each of the generations that have assumed responsibility for our business: to the partners, members of the board of directors, managers, employees, and all those who, in one way or another, have helped shape our group into a symbol of business and human excellence.

This is how one of the most valuable assets of our business group- our reputation- has been created. An attribute of great importance that makes us worthy of the recognition and trust of our interest groups and society as a whole.

This Code of Ethics aims to frame the ethical behaviour of all the group companies, and of all its personnel, constituting a guide for each and every one of us, aimed at the common good. Its objective is to remind us that **not only what we do is important, but the way in which we do it**, committing ourselves to comply with and defend this Code of Ethics, ensuring business results do not take precedence.

Its acknowledgement, compliance, dissemination and promotion is the task, and responsibility of ALL, without exception, in any circumstance related to our being part of this business group, understood as a single Company; with our colleagues, customers, suppliers, consumers, competitors, partners, institutions and governments, all over the world.

While this Code does not aim to cover all possible situations that may arise, it does establish a framework of reference to which to resort in the event of any circumstance that may give rise to conflict.

**The Board of Directors of Corporación
Hijos de Rivera, S.L.**

GLOBAL COMMITMENT

Corporación Hijos de Rivera, S.L. (Hereinafter, "**the Company**"), is the head of a family-owned business group, mainly dedicated to the manufacture, marketing and distribution of beverages, with an international orientation which, through its partners and, ultimately, its Board of Directors, is fully committed to complying with and enforcing the laws. For clarification purposes, this Code of Ethics extends its effects to all companies which form part of the business group of Corporación Hijos de Rivera S.L. Therefore, whenever this Code refers to "Company" such reference shall be understood as made to the whole business group.

To this end, all persons belonging to this Company, as well as all customers, suppliers and groups of interest of the same, must carry out their activity and functions in strict compliance with the legislation in force in all areas and territories in which it operates, respecting also the good uses and customs thereof.

Likewise, all the members and companies of the Company must respect the regulations and internal policies of the same, as well as the guidelines and provisions specified in this Code of Ethics (hereinafter, "**the Code**"), and maintain, in any case, the commitment to act with the **utmost thoroughness, integrity and responsibility** in all its activities.

This Code of Ethics guarantees the collective application of the commitments of the Company towards (i) the enforcement of human and labour rights, and (ii) the integration of the entire collective of individuals, with their complexity and diversity, into the corporate culture.

AIM

This Code of Ethics constitutes an explicit declaration of the principles, values and guidelines of conduct that should guide and promote the ethical behaviour of the entities comprising the Company, in general, and of all individuals who are part of it, in particular.

SCOPE OF APPLICATION

This Code of Ethics is applicable to all persons who have an employment relationship with the Company in any place where it operates. For the sake of clarity, it applies to all directors -in accordance with the Organization Chart of the Company-, and employees of the same, including trainees (hereinafter, "**the personnel**"), as well as those other persons whose activity is expressly subject to this Code.

ETHICS COMMITTEE



In order to ensure that the Company acts in accordance with this Code of Ethics, a Corporate Ethics Committee (hereinafter, the "**Ethics Committee**") has been established. Such Committee is responsible for ensuring compliance with the Code, its implementation, dissemination, training, updating and interpretation, as well as the proper functioning of the procedures and protocols provided for this purpose and the establishment of appropriate measures to prevent its violation.

In this way, the Ethics Committee will have the following Competences and main functions:

ADVISORY BODY

Responsible for interpreting the terms and meaning of the Code, as well as resolving any doubts in relation to it, in general, and its compliance and content, in particular.

RESOLUTION BODY

In accordance with the provisions of Article 8 of Law 2/2023, regulating the protection of persons who report on regulatory infractions and the fight against corruption (the "Law 2/2023" or "Law on the Protection of the Informant"), the Ethics Committee is the body responsible for the internal information system (hereinafter, the "**IIS**"), in the terms provided for in the Law 2/2023, and referred to in the penultimate section of this Code.

To this end, the Committee will perform its functions independently and autonomously from the Board of Directors of the Company, and will have at their disposal all the material and human resources to carry them out, being able to outsource the management of the internal information system in the terms provided for in Law 2/2023. In addition, the Ethics Committee will exercise its functions as responsible for the internal information system of the Company including any entities which form part of the same in accordance with the definition contained in article 42 of the Spanish Code of Commerce.

The Committee shall delegate to one of its committee members the powers of managing the IIS and processing investigation files, without prejudice to the outsourcing of the management of the System that may be established. Any such committee member must meet the requirements of article 8.5 of Law 2/2023.

PREVENTION AND MONITORING BODY

The Ethics Committee shall ensure compliance with the Code and establish, coordinate and monitor the relevant preventive measures in order to avoid non-compliance.

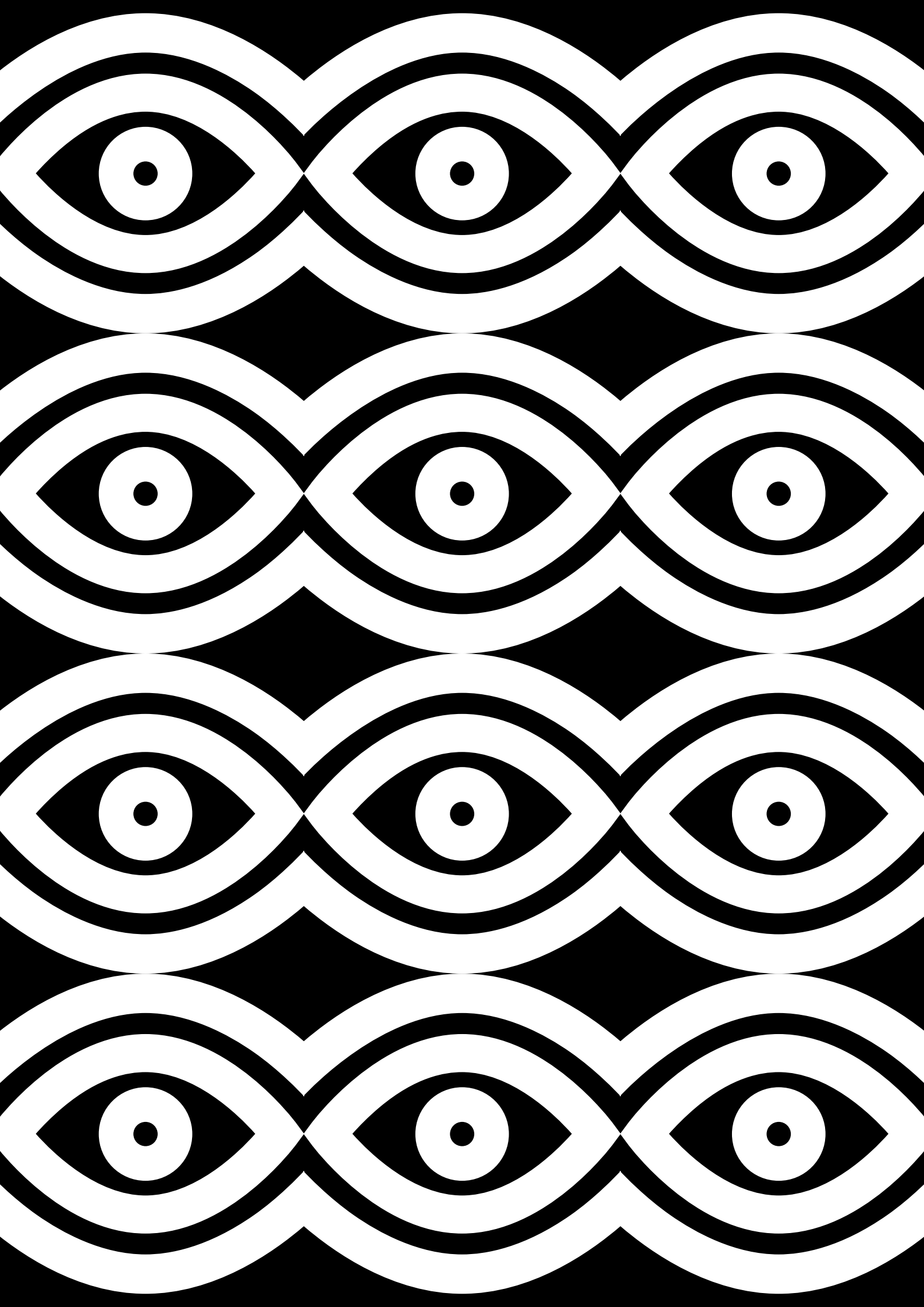
PROMOTION AND INFORMATION BODY

The Ethics Committee will be responsible for disseminating and promoting the values and behaviour contained in this Code, as well as reporting on it and its compliance, evaluating it periodically and proposing, where appropriate, the updating or revision of its content to the pertinent Board of Directors of the Company.

The Ethics Committee may also acquire any other competence that, with respect to the Code, its compliance and/or appropriateness, may be assigned by the Company's Board of Directors. Such assignment would be done without prejudice to the supervisory and management functions that are legally or statutorily required from each of the governing bodies of the Company.

For these purposes, all entities part of the Company and all its personnel must cooperate with the Ethics Committee, in the broadest terms, in anything that may be necessary within the scope of its competences and functions.

The Ethics Committee shall be appointed by the Company Board of Directors who shall appoint, from amongst its members, a Chairman and Secretary. The Ethics Committee will be able to develop Operating Procedures that govern the functioning of such Committee.



DISSEMINATION AND ACCEPTANCE

The Company shall take appropriate measures to ensure that all members and employees of the Company are aware of the contents of the Code, and understand its scope, in order to apply it to their work, functions and behaviour.

To this end, it will be the obligation of the **Ethics Committee**, with the collaboration and support of any internal teams it considers appropriate, to disseminate and promote the Code amongst the persons subject to it, in accordance with its scope of application, through the Dissemination and Training Plan that will be prepared for this purpose.

All persons subject to this Code must **expressly accept it**, internalizing the values and guidelines of conduct that integrate it, in their professional performance.

In particular, it is the responsibility of all **personnel** of the Company to know and comply with the laws that govern their work environment, as well as the content of this Code of Ethics, undertaking to comply with the same in writing. Any employees who initiated their employment relationship with the Company prior to the publication of the first version of this Code, shall sign the said undertaking.

With regard to any future employees, they will receive the present Code of Ethics at the beginning of their contractual relationship with the Company and will proceed to undertake to comply with the same through the signature of an Annex to their employment contract.

In accordance with the above, and as will be included in the Dissemination and Training Plan of this Code, each department of each of the companies that form part of the Company, shall in collaboration and coordination with the other departments of the same be responsible for disseminating and promoting this Code, expressly, amongst the different **stakeholders** of the Company with which they have a relationship in the performance of their functions (customers, suppliers, etc.), establishing a specific dissemination procedure for each of them, as appropriate.

Likewise, the Code of Ethics will be permanently available for consultation through the information platforms of the Company and the other companies of the Company.

ETHICAL BEHAVIOUR



A.

IN RELATION TO SUPPLIERS AND CUSTOMERS OF THE COMPANY

1. OBJECTIVITY, TRANSPARENCY AND DILIGENT ACTION

– Objectivity in the selection processes of suppliers and contractors

The selection processes for suppliers and contractors of the Company must be developed in terms of transparency, fairness, impartiality, and objectivity, avoiding incurring in conflicts of interest, in accordance with the provisions of this Code.

Thus, in all circumstances, all the people of this Company must apply, in these processes, the necessary criteria of quality, opportunity and cost, always acting in defence of the interests of the same.

– Gifts, hospitality and favours

The employees and directors of the Company should never influence the will of third parties, directly or indirectly, through favours, in order to obtain benefits or advantages in their own interest or that of the Company, nor should they accept this type of practice when it is a third party that offers them preferential treatment, outside the terms established in this Code.

Engaging in this type of activity not only constitutes a violation of this Code, but also of the anti-corruption laws

in force, and may, therefore, result in criminal costs for the offender and for the Company, as well as cause serious damage to its reputation.

In this way, the employees and managers of the Company do not accept, in any case, personally, favours, gifts, services, economic advantages, or of another type, offered by third parties, which are not disclosed to and expressly accepted by their immediate hierarchical superior, and which could influence their objectivity or affect, in any way, any commercial or professional relationship.

Likewise, the personnel of the Company must not offer gifts of any kind to customers, suppliers, partners, or any person or entity related to it, with the aim to illicitly influence their relationship with the Company.

Symbolic gifts, provided that they fit within the usual limits of courtesy, are considered acceptable and are not subject to regulation of this Code, and in any case manifestations and showing off situations must be avoided.

If in doubt, the immediate hierarchical superior of the professional should be consulted.

– Diligent actions and correct business practices

All personnel of the Company shall act, internally and regarding third parties, in good faith, diligently and responsibly in the performance of their duties.

In this regard, the Company, through its employees, will respect the agreements reached, both with customers, suppliers or any third party, faithfully complying with the commitments acquired and avoiding, in any case, any type of commercial fraud.

To this end, both within the companies of the Company, and with third parties, the Company and its personnel will always negotiate and contract in a transparent, honest and informed manner, providing all parties with the information and documentation that, where appropriate, is relevant for the proper development of the commercial relationship.

2. SUPPLIERS SUBJECT TO SPECIAL DUE DILIGENCE

The Company, and its personnel, must maintain special diligence and care in business relations with suppliers, contractors, or third parties that are especially vulnerable due to their nature and structure, such as primary suppliers, who could eventually depend in economic or in any other terms from the Company, avoiding any act or behaviour that could be abusive, disloyal or contrary to good faith, with them.

3. PREVENTION OF MONEY LAUNDERING

The Company has general procedures to prevent irregular or laundering payments of capital originating from illicit or criminal activities.

Commercial relationships will only be established with customers, suppliers or collaborators according to their professional competence, in order to avoid money laundering.

In general, the Company and its employees and, especially, those of economic-financial departments, will meet the obligations that may be required of them in the current legislation on the prevention of Money Laundering, for which purpose they will receive the necessary training to do so.

4. DUTY OF CONFIDENTIALITY AND PROFESSIONAL SECRECY

All data, information and/or documentation relating, or known, by virtue of the business, operations, negotiations and/or transactions with clients and/or suppliers of the Company, is strictly confidential so, except in compliance with legally established obligations, it may not be disclosed to third parties, by directors or employees of this Company who are subject to their duty of professional secrecy and confidentiality obligations.

B.

IN RELATION TO THE COMPETITORS OF THE COMPANY

1. RESPECTING FREE COMPETITION

An honest Company

The Company believes in free competition and commercial loyalty, in accordance with current legislation and the anti-monopoly regulations; and believes in a market in which there is free choice for both the producer and the consumer, and in which the rules of the game are well defined for all.

Therefore, this Company rejects negotiations or agreements on prices, trade policies or market shares with competitors.

The Company is committed to competing fairly in the markets, promoting free competition, in favour of consumers and the efficiency of companies.

2. MARKET BEHAVIOUR

The Company rejects misleading or denigrating advertising, as well as any other practice that goes against good faith, fair competition or third parties.

C.

IN RELATION TO PERSONNEL OF THE COMPANY

1. CONFLICTS OF INTEREST

– Avoid and manage Conflicts of Interest

Conflicts of interest arise when the personal interests of a professional of the Company (or persons linked to them), are contrary to the interests of the latter; interfere with the fulfilment of their professional duties and responsibilities and / or involve them at personal level, in any economic operation of or with the Company.

– Disclosure of Conflicts of Interest

By employees

In case of a Company employee's conflict of interest, the conflict must be disclosed to their immediate superior, who will adopt the appropriate decision in this regard or transfer the case to the Ethics Committee so that, in collaboration with the Human Resources department and / or those departments or means of the Company that may be necessary, may propose a resolution of the situation as fairly and transparently as possible.

By the directors

In the event of a conflict of interest of a director of the Company, the conflict must be disclosed to their immediate hierarchical superior, who will adopt the appropriate decision and transfer the case to the chief executive of their business unit who, if necessary, may resolve the situation or submit it to the consideration of the Ethics Committee of the Company in order to propose a resolution to the situation.

Notwithstanding the aforementioned, should it be relevant due to the circumstances, the Company employee or

director affected may disclose the conflict directly to the Ethics Committee, without first going to their immediate superior or, where appropriate, to the first executive of their business unit, so that the Committee can propose a resolution of the situation as provided.

– Avoiding competition with the Company

The Company respects the participation of its managers and employees in external activities, provided that it is not in companies in the sector or likely to compete with the Company. In any case, it must be a legal and ethical activity, which does not conflict with the functions performed by the professional in the Company, does not jeopardize its reputation, or clash with its interests.

– Duty to abstain when necessary

In the event that any professional of the Company is involved in any contract or transaction in which there is a conflict of interest, they must recuse themselves and **refrain from intervening**, directly or indirectly, in the decision-making related to it, in order to safeguard impartiality.

– The Company's employees does not take advantage of corporate opportunities for their own benefit

As a result of their daily work in the Company and the handling of information related to it, it is possible that at some point the employees will be presented with different commercial or business opportunities. However, the personnel of the Company will **refrain from attending** any of these opportunities and taking particular advantage of them.

– Related Persons

For the purposes of this Code and the provisions relating to possible situations of conflict of interest, persons linked to the personnel of the Company shall be understood to be the spouse, ascendants, descendants and/or siblings of the employees or directors of the Company, as well as any companies in which they, or their related parties have, directly or indirectly, a majority control.

2. CONFIDENTIAL INFORMATION

– Protection of the Company's confidential information

Much of the information that is handled on a daily basis is of a confidential nature: strategies, plans, recipes, production systems, designs, files, financial data, commercial data of customers and suppliers or of any other nature, which have not been published.

All of this is part of the Company's assets and keeping them secret is often key to success at every step towards its growth.

The personnel of the Company must maintain **absolute confidentiality** and duty of secrecy, both during the validity of their contractual relationship, and after the termination of the same.

To this end, a Protocol for the Classification of Documentation and Special Confidential Information **will be established**, in order to classify and expressly name, as such, information and documentation that, for the Company, is especially sensitive and requires greater custody and limited dissemination. The said Protocol will establish the appropriate procedures for such protection while maintaining, the duty of professional secrecy in relation to all information and documentation handled by the personnel of the Company in their professional performance, whether expressly classified or not.

– Respect for third-party information

The Company respects the right of third parties to preserve their confidential information, rejecting any sensitive information from third parties that does not arrive through natural or lawful channels, taking maximum care of any information which must be handled as a result of employment or commercial relationships.

3. ASSET PROTECTION

In this Company, the necessary material to carry out the activity is taken care of.

– Responsible and reasonable use of resources

The employees of the Company ensure the responsible and reasonable use of the assets, both tangible and intangible, that are made available to them. This implies using them properly and efficiently for the benefit of the Company and, in no case fraudulently or dishonestly. In addition, special care should be taken of those assets that contain confidential information, to avoid their loss or destruction, communicating any of these circumstances, as soon as possible, to the appropriate immediate superior.

– Enforcement of communications

Any communication sent from the Company, by any means, represents it and, therefore, the employees will be careful both when disclosing sensitive or confidential information, and in the way in which it is expressed with the rest of the employees and / or with any third party.

– Asset Control

In general, the Company reserves the right to control the use of all assets made available to its personnel and, amongst them, especially the use of all data and files that are part of the Company's digital network, always within the framework of current legislation.

4. CRIME AND FRAUD PREVENTION

In order to **avoid fraudulent activities**, the Company and its employees undertake to ensure the transparency of all information that Group companies transmit to the markets, to society, to their auditors and to public institutions, paying special attention to financial information.

For its part, the Company will eventually develop, implement, and follow a Crime Prevention Plan to whose terms, training, implementation, management and procedures, the Group's personnel will be committed.

5. DISCRIMINATION AND HARASSMENT

The Company and its employees promote a dignified and respectful work environment.

– Discrimination and harassment are rejected

The Company in no case allows any type of harassment towards any person, as well as any type of discrimination based on gender, age, race, religious or political belief, sexual orientation, disability or nationality.

6. CORPORATE IMAGE AND REPUTATION

The image and reputation of the Company is one of its most valuable assets.

The employees of the Company undertakes to protect the good name of the Company in each of the activities they develop, ensuring the projection of its image as an ethical and responsible Company. All employees are committed, personally and professionally, to represent this Company with **dignity and honour** in any of its areas of action, projecting and promoting its image and reputation, in accordance with the spirit of this Code and the values of the Company.

In this regard, the employees of the Company, both as a group and in individual capacity, share the Company principles and values, in general and, especially, those provided for in this Code, behaving preferably in any area of their lives, in coherence and consequence with them.

– Business and institutional relations

In dealing with customers, suppliers and institutions, the employees of the Company faithfully represent the values of the same preserving always a ethical, respectful, and honourable behaviour. Likewise, they monitor the treatment of the name of any of the companies that make it up, in order to avoid conflicts that may negatively affect the interests, prestige and public image of the same.

– Online platforms

The employees of the Company must take care of the reputation of the Company also in its activity on virtual platforms, such as social networks or any other form of public communication.

– Media Relations

Beyond the scope of our responsibilities within the Company or projects in which we carry out our functions, we will refrain from making public communications, statements, or assessments of any kind about it or any of the entities that comprise it, in a personal capacity or in its representation, in any media, whether written, audio-visual or online, reserving this function to the Corporate Communication department. All employees will consult previously with the said department in those cases in which a media agent requests direct information that may be sensitive. The said extent will not affect activities framed in professional, promotional, or marketing events taking place in the ordinary course of business of the Company.

7. RECRUITMENT, PROFESSIONAL DEVELOPMENT AND PERSONAL DEVELOPMENT

The recruiting, hiring, remuneration and professional promotion of the personnel of the Company will be evaluated in accordance with the qualification and professional functions of the corresponding position, based on objective criteria of qualifications, **equity, competence, merit and transparency**, promoting, in any case, equal treatment and opportunities.

The Company will promote the stability **and quality of employment** generated by its business units, aware of the importance that such factors have in the **particular development, well-being and quality of life of its personnel, respecting and promoting**, likewise, the **balance** between their professional life and personal and family life.

Likewise, the Company undertakes to provide the necessary means to contribute to the learning, **training** and updating of the knowledge, skills and risks of its personnel, in order to facilitate their employability and professional development and provide more value to customers, employees, the Company and all the companies that make it up.

8. EMPLOYEE PARTICIPATION, SOCIAL DIALOGUE

The Company is aware of the importance of fostering a communicative and deliberative work environment,

promoting social dialogue between its companies, their employees and their representatives, as a source of consultation and joint resolution of social problems, based on consensus.

At all times, the Company **shall promote collaboration, transparency, communication**, dialogue and consensus with its personnel, providing the latter the best conditions under which to be represented, and a full willingness and collaboration of the Company with its representatives..

9. OCCUPATIONAL HEALTH AND SAFETY

Health and safety in the workplace are an obligation of this Company, which will put the necessary means in place to minimize risks at work, both for its own personnel and for any subcontractors who may provide their services at the Company facilities, promoting a diligent and strict Occupational Risks Prevention Policy.

All the personnel of the Company will actively ensure the creation and maintenance of a **safe work environment** and promote and comply with the standards established in each workplace and each position, anticipating the necessary preventive measures to generate the best possible conditions of occupational health and safety.

D.

IN RELATION TO SOCIETY

1. RESPECT FOR INSTITUTIONS AND PRINCIPLES OF IMPARTIALITY

The Company and its employees respect human rights and democratic institutions.

The employees of the Company behaves in a lawful and respectful manner towards the authorities and public institutions.

The Company and its employees do not accept or offer gifts or commissions, in cash or in kind.

The Company and its employees do not make contributions to political parties or public institutions, which are incompatible with current legislation or with the most rigorous transparency.

The Company maintains the principle of political, religious, and cultural impartiality.

The Company does not interfere neither politically nor religiously in the communities where it operates, respecting, in any case, the cultural identity of any of them.

2. COMMITMENT AND SOCIAL RESPONSIBILITY

The Company collaborates with its community.

The Company undertakes, to the extent of its possibilities, to collaborate with public administrations, as well as with non-governmental entities and organizations, with the aim of improving the social conditions of the most disadvantaged.

Collaborations and patronage.

The Company articulates this commitment through patronage, contributions, and collaborations that it channels through agreements with social organizations, always in line with the mission and objectives of the Company.

Promoting volunteering.

The Company encourages all its employees to participate in social cooperation and volunteer activities, through corporate action groups.

3. COMMITMENT TO ENVIRONMENTAL PROTECTION

The Company is firmly committed to the protection and respect for the environment and, therefore, carries out its activity under the premise of minimizing negative environmental impacts and preventing pollution, promoting R&D that improves processes. The Company also seeks the adequate training of its employees and collaborators in topics such as the proper environmental management of the different Company activities, the associated risks and the optimal management of the natural heritage.

E.

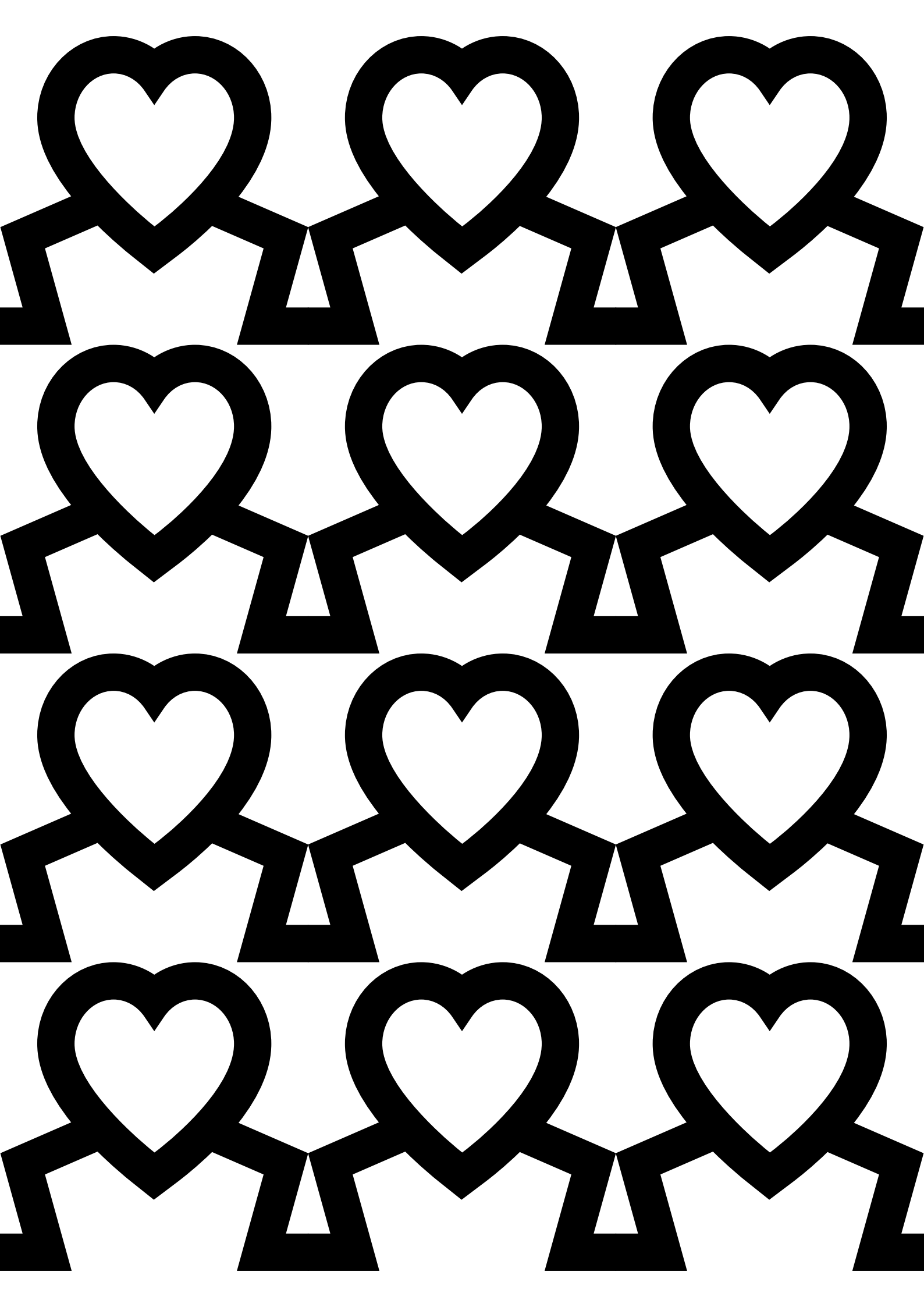
IN RELATION TO PUBLIC ADMINISTRATIONS

1. The Company and all its employees act with **honesty, thoroughness, and integrity** in their relations with the Public Administrations, to ensure that decisions and processes are carried out with transparency and are based on objective criteria.

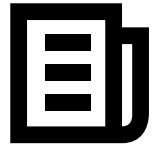
2. The Company and all its personnel **reject the offer of improper benefits** with the aim of obtaining preferential treatment or influencing official decisions or actions.

3. The Company and all its employees **undertake to collaborate and provide public administrations** with the required information with the utmost diligence, guaranteeing its veracity.

4. The Company and all its employees **promptly comply with all their legally enforceable obligations and, especially, with the fiscal and Social Security obligations** that correspond to them.



COMPLIANCE



This Code of Ethics is part of the mission and values of the Company. Any violation of the same may cause a serious damage to the Company that must be prevented and avoided by all.

It is, therefore, the responsibility of ALL to collaborate in the dissemination and promotion of this Code and, especially, to ensure compliance, which is **mandatory**. Independently of such extent, compliance with the laws in force in the territories in which we operate, must always be respected and therefore this code may be adapted if necessary to each case and country.

To this end, apart from the measures that will be adopted under the Plan for the Dissemination and Training of the Code of Ethics, the same will be subject to **express acceptance** by the administrative bodies of all the entities that are directly or indirectly wholly owned by the Company or in which the latter has a majority control.

All those who are part of the Company have the obligation to inform the Ethics Committee of any breach or violation

of the provisions of the Code of Ethics as well as possible questions about its application. In any case, the violation of this Code of Ethics will be analysed by the Ethical Committee, and may lead to the initiation of a disciplinary proceeding or, in particularly serious cases, to the termination of the contractual relationship.

For this purpose, no member of this Company, without prejudice to their position or hierarchical level, may urge and / or encourage another member of the same to breach current legislation, and / or this Code, just as no member of the Company may excuse any behaviour that is contrary to this Code or in violation of any enforceable provision, based on the instruction of a hierarchical superior.



INTERNAL INFORMATION SYSTEM REPORTING CHANNEL



A.

INTRODUCTION

In the terms provided for in Law 2/2023, the reporting channel is the Company's internal information system, which has a double objective: (i) on the one hand, to protect the persons who report the breaches included in its scope -regulated in B (ii) below- and, on the other, (ii) to strengthen and promote a culture of information and disclosure as a mechanism to prevent and detect irregular conduct within the Group, and react to it.

All without prejudice to the right of any employee of the Company to go to their hierarchical superior to make any disclosure they deem appropriate.

B.

SCOPE OF APPLICATION OF THE REPORTING CHANNEL

1. SUBJECTIVE SCOPE

It applies to Informants, that is, (i) to any person who has such status under Law 2/2023, as well as (ii) to the subjects bound by this Code, who make a disclosure about possible breaches which have taken or are taking place in a work or professional context in relation to the matters listed in the following section.

2. OBJECTIVE SCOPE

Breaches are considered to be (i) the actions or omissions included in article 2 of Law 2/2023 on the Protection of the Informant, as well as (ii) the actions or omissions that suppose a breach of this Code.

C.

GENERAL PRINCIPLES THAT INSPIRE THE REPORTING CHANNEL

Through the following link <https://corporacionhijosderivera.com/gobierno-valores-y-etica/> you can access the Internal Information System Policy and the Reporting Channel. You will also be able to find information on the essential principles that govern the Procedure for the management and processing of communications received through the Reporting Channel, as well as detailed information on how to access it.

OTHER ASPECTS

A.

CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA

All documentation and information provided or handled under or in compliance with this Code of Ethics will be considered **especially sensitive and confidential** and, as such, will be subject to greater custody in accordance with the Protocol for the Classification of Documentation and Especially Confidential Information provided.

Likewise, all **personal data** collected through the Reporting Channel will be processed in accordance with current legislation on the protection of personal data, establishing, therefore, the corresponding information and consent procedure.

C.

DISCIPLINARY SANCTIONS

Failure to comply with any of the criteria contained in this Code will be sanctioned in accordance with the disciplinary regime in force, without prejudice to any other responsibilities in which the offender may have incurred and which, where appropriate, will be brought to the attention of the competent authorities.

B.

COMMITMENT TO NON-RETALIATION

The Company guarantees the absence of, and will persecute any type of retaliation derived from the reporting of any breach of this Code, or the participation or collaboration in any investigation procedure.

D.

ACTIVITY REPORT

Annually, the Ethics Committee will present a Report to the Board of Directors of the Company, who may circulate the same to other Governing Bodies, on the activity carried out in relation to the compliance of this Code during the year.

This report will reflect the actions carried out to promote the Code of Ethics, as well as the interventions of the Ethics Committee and any other body, department or manager of the Company that, where appropriate, had to act in any way in order to promote, disseminate and/or apply this Code.

Likewise, the Ethics Committee will inform the employees of the Company, periodically, through means at its disposal, about any interpretation queries that have been received and resolved with regard to the Code.



VALIDITY, REVIEW AND UPDATE

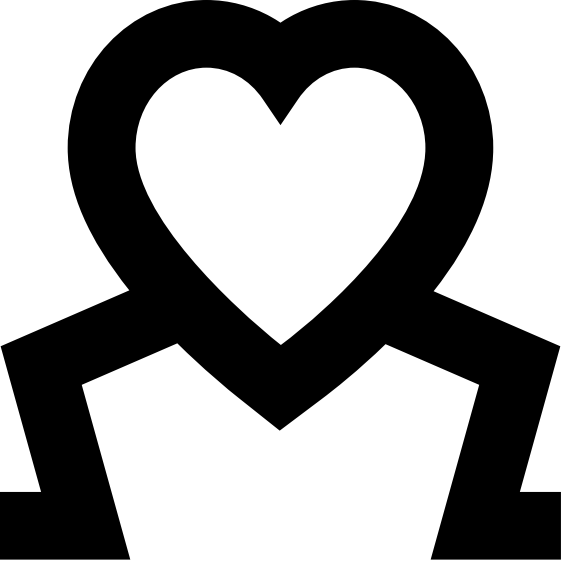


VALIDITY, REVIEW AND UPDATE

This Code of Ethics, approved by the Board of Directors of the Company on June 6, 2023, will enter into force once communicated to the entire Company and in any case before June 13, 2023, and will remain in force as long as the aforementioned Board does not approve its update, revision or repeal.

In any case, the Code will be reviewed and/or updated, **annually** and, additionally, whenever so agreed by the Board of Directors of the Company, at the proposal of the Ethics Committee.





HR

HIJOS
DE RIVERA

c/ José María Rivera Corral, nº6.
15008 A Grela. A Coruña

