



GRUPO LACTOGAL

SUPPLIER CODE OF ETHICS AND CONDUCT

NURTURING OUR ROOTS.
NOURISHING THE FUTURE.

WE CARE FOR LACTOGAL'S ESSENCE

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OPENING MESSAGE

We operate in a constantly changing world, where new challenges require new responses, always guided by the same Values that guide us. It is in such moments that our true essence is revealed: what makes us who we are and gives meaning to our collective purpose.

This Code is Grupo Lactogal's commitment to ethics, responsibility and excellence. We believe that integrity, respect and trust are the foundation of everything we do. Every decision and behaviour reflects the commitment we assume with one another, with the Company and with society.

We want this Code to be lived and felt by everyone – employees, partners and suppliers–used as a tool for trust and dialogue that reinforces transparency and cooperation, based on Simplicity, Determination and Commitment.

Caring for the essence means ensuring that our daily decisions reflect what we believe in and the pride we take in being Grupo Lactogal.

1. INTRODUCTION AND SCOPE

At Grupo Lactogal, we believe trust, integrity and responsibility are the basis of every relationship we build.

Caring for our origin and nourishing the future is a shared commitment with all who work alongside us – including our suppliers.

This Supplier Code of Ethics and Conduct sets out the principles that guide our actions and the behaviours expected from all suppliers, service providers, consultants, producers, business partners and subcontractors.

It applies to:

- all direct and indirect suppliers;
- entities acting on behalf of or representing Grupo Lactogal;
- any element of the supply chain whose activity impacts the quality, sustainability or integrity of our operations.

Adherence to this Code is a prerequisite for starting and maintaining responsible, fair and transparent business relationships.

2. GENERAL PRINCIPLES

We live our essence with Simplicity, Determination and Commitment. We expect our suppliers to share these values and consistently act with:

- Integrity - respecting law and for Grupo Lactogal's principles;
- Respect - valuing people and the impact of decisions;
- Transparency - ensuring fair, loyal and responsible relationships;
- Sustainability - contributing to an ethical, conscious and balanced value chain.

Suppliers must ensure these principles are respected by their employees and subcontractors.

3. WE BUILD RESPONSIBLE RELATIONSHIPS WITH SUPPLIERS

We cultivate cooperative relationships based on shared value creation.

Relationships with Grupo Lactogal's suppliers are grounded in seriousness, respect and rigour, ensuring effective collaboration for both parties. This relationship is a key element in achieving the Group's objectives, therefore an ethical relationship with suppliers and service providers, must be promoted, by treating them with fairness, impartiality and loyalty.

Grupo Lactogal ensures that all negotiation processes are conducted with ethics, impartiality, transparency and confidentiality—principles that bind all direct and indirect participants.

At Grupo Lactogal, we want to continue to:

- select suppliers based on competitiveness and stakeholder needs, safeguarding the Group's interest.
- protect supplier information and not disclosing it to third parties.
- apply due diligence questionnaires whenever necessary to deepen supplier characterisation and reinforce the assessment of their compliance with Grupo Lactogal's principles.

At Grupo Lactogal, we reject:

- selecting suppliers who do not demonstrably uphold responsible practices in environmental matters, occupational safety and compliance with labour legislation;
- agreements (including any subsequent amendments or addenda) that are not complete, are ambiguous or are not properly documented;
- requesting unreasonable conditions from suppliers for the continuation of contracts.

4. BUSINESS ETHICS AND INTEGRITY

4.1. PREVENTION OF CORRUPTION AND BRIBERY

At Grupo Lactogal we reject any form of corruption, bribery or undue advantage. We expect the same level of rigour from our suppliers. They must therefore:

- prohibit any form of bribery, extortion, corruption or favouritism;
- avoid offering, requesting or accepting benefits that may compromise – or appear to compromise – decision-making;
- refuse facilitation payments or illegitimate rewards.

Collaboration in audits, verifications or requests for clarification is an integral part of an ethical relation

4.2. CONFLICTS OF INTEREST

Suppliers must identify and communicate any situation that may, actually or apparently, influence the autonomy and objectivity of commercial decisions.

Integrity requires that no undue influence is exerted over Grupo Lactogal employees or any third party.

4.3. TRANSPARENCY AND ACCURACY OF INFORMATION

Trust is built on truth.

All information provided must be accurate, complete and reliable, including:

- financial data;
- certifications and licences;
- technical information;
- sustainability reports.

Omissions or distortions are not compatible with Grupo Lactogal's Values.

5. HUMAN RIGHTS AND WORKING CONDITIONS

At Grupo Lactogal, we respect the dignity of every person. We require our supply chain to reflect the same culture. Suppliers must ensure:

5.1. PROHIBITION OF CHILD LABOUR

The employment of minors beyond legal limits is not permitted, nor is any form of child exploitation.

5.2. PROHIBITION OF FORCED LABOUR

Any form of involuntary work, human trafficking, servitude or retention of personal documents is strictly prohibited.

5.3. DECENT WORKING CONDITIONS

Supplier employees must have:

- appropriate working hours and rest periods;
- clear and transparent employment contracts;
- fair remuneration in accordance with applicable legislation.

5.4. NON-DISCRIMINATION AND EQUALITY

Discrimination based on gender, age, origin, disability, sexual orientation or any other condition is not permitted.

5.5. HEALTH AND SAFETY AT WORK

Suppliers must prevent risks, provide adequate training and ensure the availability and proper use of protective equipment.

No activities may be carried out by employees or external service providers without the appropriate training and specific authorisation, particularly in the case of higher-risk tasks.

6. ENVIRONMENT AND SUSTAINABILITY

Sustainability is a commitment that runs through our entire value chain.

Suppliers must:

6.1. COMPLY WITH ENVIRONMENTAL LEGISLATION

This includes requirements related to emissions, waste, noise, water resources and chemical management.

6.2. REDUCE RESOURCE CONSUMPTION

Suppliers must promote:

- energy efficiency;
- responsible use of water;
- circular-economy practices;
- recyclable or reusable materials.

6.3. RESPONSIBLE WASTE MANAGEMENT

Suppliers must ensure proper disposal and treatment of waste, preventing contamination of soil or water.

6.4. SUSTAINABLE PRODUCTS AND PROCESSES

Suppliers must provide raw materials or services that are preferably certified or have a low environmental impact.

7. ANIMAL WELFARE (WHEN APPLICABLE)

We care for our origin and value animal welfare.

Suppliers who provide raw materials or services related to animals must ensure:

- animal-welfare practices;
- independent audits;
- absence of mistreatment;
- compliance with the requirements of Programa Garantia Lactogal.

8. QUALITY, FOOD SAFETY AND TRACEABILITY

Where applicable, suppliers must:

- ensure products that are safe and compliant with food-legislation requirements;
- guarantee full traceability;
- comply with agreed technical specifications;

- allow audits and inspections;
- immediately report any quality or safety incident.

9. CONFIDENTIALITY, DATA PROTECTION AND INTELLECTUAL PROPERTY

Suppliers must:

- protect all information belonging to Grupo Lactogal;
- ensure compliance with GDPR requirements;
- refrain from disclosing data, processes or know-how without proper authorisation;
- use all information strictly for the purposes of the contractual relationship.

10. ETHICS IN THE SUPPLY CHAIN

Suppliers commit to extending these principles to their own subcontractors and partners.

They must:

- monitor third-party practices;
- communicate risks or violations;
- ensure effective control over the value chain.

11. AUDIT, MONITORING AND CONSEQUENCES

Grupo Lactogal reserves the right to:

- carry out audits and assessments;
- request documents or evidence of compliance;
- require improvement plans;
- apply corrective measures or suspend the commercial relationship.

12. WHISTLEBLOWING CHANNEL

Suppliers and their employees may report concerns - anonymously or identified- via:

www.grupolactogal.com/en/whistleblower-channel

Grupo Lactogal guarantees confidentiality and prohibits any form of retaliation.

13. ACCEPTANCE AND COMMITMENT

Collaboration with Grupo Lactogal implies acceptance of this Code. Non-acceptance or non-compliance may result in contractual termination.

Grupo Lactogal may request a signed declaration of commitment or proof that the Code has been communicated to the supplier's employees and subcontractors.

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