



europe  
snacks

# The ES Supplier Code



### 1. Purpose

Europe Snacks Supplier Code, or named ES Supplier Code (“the Code”) defines the non-negotiable minimum standards that we ask our suppliers and their sub-tier suppliers (“the Supplier(s)”), to respect and to adhere to when conducting business with Europe Snacks Group (“ES Group”). This document helps the continued implementation of our commitment to international standards. The Code is an extension of our Europe Snacks Code of Ethics (“ES Code of Ethics”).

### 2. Scope

The standards of the Code set forth expectations for the Supplier with whom ES Group does business, including their parent, subsidiary or affiliate entities, as well as all others with whom they do business including all employees (including permanent, temporary, contract agency and migrant workers), upstream suppliers and other third-parties. It is the Supplier’s responsibility to disseminate, educate and exercise diligence in verifying compliance of this Code to its employees, agents and sub tier suppliers, including farmers when relevant.

#### **Governance and Allocations of Responsibilities**

The Ethics Committee is responsible for fostering and upholding a culture of integrity, honesty, and ethical conduct across the Europe Snacks Group. It ensures that ethics remain a core priority, rejects all forms of unethical behavior even where this may lead to short-term business losses, allocates sufficient and appropriate resources to ethics-related initiatives, including ethics training, and leads by example by demonstrating exemplary ethical conduct in all business activities. The Ethics Committee is composed of the three local Directors, the HR Director Group Advisory, and the Group Legal Officer. Preventing unethical conduct is a key priority for the Europe Snacks Group, and all individuals, at every level of the organization, are expected to act with integrity and contribute to maintaining the highest ethical standards.

As role models, the members of the Ethics Committee drive the development of an ethical corporate culture, have overall responsibility for ethics governance, and set the tone from the top. In line with the guidelines and actions of the Ethics Committee, all employees and associated persons must comply with this policy and the provisions set out in the Code of Ethics, complete mandatory ethics training, and report any conduct or situation that appears suspicious or may constitute a breach of the Code.

The Procurement Department is also responsible for promoting and ensuring ethical business practices within its area of activity and throughout the supply chain. It ensures that all suppliers and business partners adhere to ethical principles consistent with those of Europe Snacks and integrates these expectations into supplier selection, evaluation, and monitoring processes.

### 3. Compliance

ES Group expects the Supplier to adhere to all applicable laws and regulations and in particular for the pillars detailed herein, and strive to comply with international and industry standards and best practices. In the limit of sufficiently well-founded suspicion, if ES identifies areas of non-compliance, ES reserves the right to audit operations, records, policies, and procedures of the Suppliers as appropriate by law and request Suppliers to make the necessary investments in systems and conditions improvements to ensure compliance as required by law.

### 4. Continuous Improvement

ES Group recognizes that reaching the standards established in this Code is a dynamic process and encourages suppliers to continuously improve their operations. In case of improvement required, ES Group will support in the establishment of milestones and systems to ensure that practices are continuously upgraded. Failure to do so shall impact directly the ability of the Supplier to do business with ES Group.

## 5. Application

Acknowledgement of the Code is a pre-requisite in every Europe Snacks contract for supply. Unless agreed differently in a framework agreement duly executed between the Parties, ES reserves the right to not initiate, to suspend or to terminate its relationship with a supplier if the supplier refuses to consent to the Code or to take the appropriate steps to come into compliance with the Code. Through the acceptance of the Purchase Order, making reference to the Code, the Supplier commits that all its operations are subject to the provisions contained in this Code. This Code, or the demonstration of its compliance, does not create any third-party beneficiary rights for the Supplier. The standards of the Code are in addition to, and not in lieu of, provisions of any legal agreement or contract between suppliers and Europe Snacks (“ES”).

## 6. Interpretation

This Code, by its nature, does not deal with all potential situations, but rather establishes the standards to guide the conduct of the persons subject thereto in their relations with ES and with third parties by reason of their connection to ES, and to resolve any issues that might arise in the performance of their professional activities.

## 7. Amendment

This Code could be periodically updated based on compliance laws and regulations updates, and/or any new international and industry standards and best practices.



## The 4 pillars of the ES Supplier Code

### 1. Human Rights

ES Group fully supports the United Nations Framework and Guiding Principles on Business and Human Rights and expects the Supplier to respect all human rights, including labour rights, throughout its business activities. As a minimum:

#### Freedom of Association and Collective Bargaining

The Supplier should grant its employees the right to Freedom of Association and Collective Bargaining in accordance with all applicable laws and regulations.

#### Forced Labour

The Supplier must under no circumstances use, or in any other way benefit, from forced labour in line with ILO Convention No. 29 on Forced Labour and ILO Convention No. 105 on Abolition of Forced Labour. Forced labour refers to any form of indentured servitude such as the use of physical punishment, confinement, threats of violence as a method of discipline or control such as retaining employees' identification, passports, work permits or deposits as a condition of employment. Where the Supplier is using migrant or prison labourers under a legal framework, ES Group must be made aware to review appropriate documentation maintained by the Supplier.

#### Employment Practices

The supplier shall only employ workers who are legally authorized to work in their facilities and are responsible for validating employees' eligibility to work through appropriate documentation.

All work shall be voluntary, and workers shall be free to leave work or terminate their employment upon reasonable notice. To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

The Supplier must also comply with the Employment Rights Act, which includes enhanced protections against dismissal for industrial action, new employer obligations regarding gender pay gap reporting, protections against sexual harassment whistleblowing, the establishments of a Fair Work Agency to enforce employment rights, without this being an exhaustive list..

In the case of employment through third party labour agencies the Supplier shall comply with Convention No. 181 of the International Labour Organization on Private Employment Agencies.

#### Minimum Age for Employment

The use of child labour by the Supplier is strictly prohibited, in line with ILO Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labour. The ILO Convention 138 on the Minimum Age indicates that no child below 15 years (or 14 in certain developing countries) is allowed to work, subject to exceptions allowed by the ILO or national law.

If the Supplier employs young workers, it must demonstrate that the employment of young people does not expose them to undue physical risks that can harm physical, mental or emotional development.

#### Fair and Equal Treatment

The Supplier must operate with dignity, respect and integrity in regards the treatment of its employees:

- The Supplier shall not discriminate in hiring and employment practices on the grounds of criteria such as of race, colour, religion, gender, age, physical ability, national origin, sexual orientation, political affiliation, union membership, medical tests, or marital status, in line with ILO Convention No. 111 on Discrimination.
- Any form of psychological, physical, sexual or verbal abuse, intimidation, threat or harassment must not be tolerated.
- The Supplier shall respect the privacy rights of its employees whenever it gathers private information or implements employee monitoring practices.
- When the Supplier retains direct or contracted workers to provide security to safeguard its personnel and property, the Supplier will make sure that security personnel apply the same standards on fair and equal treatment.

#### Working time and rest days

The Supplier must ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to regular working hours, and overtime hours, including for breaks, rest periods, holidays, and maternity and paternity leaves. In absence of law, the Supplier shall not require a regular work week over 60 hours, employees shall be allowed at least one day off after six consecutive days of work, and any overtime worked shall be voluntary and compensated at premium rate.

#### Wages and benefits

The Supplier's employees must be provided with wages and benefits that, at a minimum, comply with national laws or industry standards whichever is higher, as well as binding collective agreements, including those pertaining to overtime work and other premium pay arrangements. In any event, wages should always be enough to meet basic needs for employees, and their entitled official dependents, and to provide some discretionary income. The Supplier must not apply disciplinary or any other forms of deductions from pay neither apply any forms of discrimination in employment and remuneration practices.

## 2. Safety and Health

ES Group expects the Supplier's operating and management systems, as well as employees, to work in preventing work-related injuries and illnesses.

### Workplace Environment

The Supplier shall provide its employees with a safe and healthy working environment. As a minimum, potable drinking water, adequate lighting, temperature, ventilation, sanitation, and personal protective equipment must be provided together with equipped work stations. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable laws and regulations.

### Emergency preparedness

The Supplier shall be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, and adequate exit facilities. The Supplier shall regularly train employees on emergency planning, responsiveness as well as medical care.

### Product Quality and Safety

All products and services delivered by the Supplier must meet the quality and safety standards required by applicable law. When conducting business with or on behalf of ES, the Supplier must comply with the ES Group quality requirements.

## 3. Corporate Social Responsibility and Environmental Sustainability

ES Group requires its Suppliers to comply and carry out operations with all applicable legal environmental requirements, laws and regulations and demonstrate continual improvement of its environmental performance. The potential environmental impacts of daily business decision-making processes should be considered along with opportunities for conservation of natural resources, recycling, source reduction and pollution control to ensure cleaner air and water and to reduce landfill wastes.

### Environmental Permits and Reporting

The Supplier shall make sure that it obtains, keeps current, and follows the reporting guidelines of all the required environmental permits and registrations to be at any time legally compliant.

### Hazardous Materials and Product Safety

The Supplier shall identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal. All the applicable laws and regulations related to hazardous materials, chemicals and substances shall be strictly followed. Supplier shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Suppliers shall ensure that key employees are aware of and trained in product safety practices.

## 4. Business Integrity

ES Group requires the Supplier to comply with all applicable ethical trade laws and regulations in the countries where materials are sourced, produced and incorporated into ES product ("country of use"). In case of services, the location of service delivery should prevail.

### Anti-bribery

The Supplier must never, directly or through intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third Party, whether public or private. The Supplier will not pay or accept bribes, arrange or accept kickbacks and shall not take any actions to violate, or cause its business partners to violate, any applicable anti-bribery laws and regulations including the UK Bribery Acts and EU anti-bribery laws.

### Anti-Money Laundering and Tax Evasion Controls

Suppliers are expected to comply with all international laws on anti-money laundering and all applicable tax laws in the countries where it operates.

### Conflict of Interest

The Supplier is expected to report to ES Group any situation that may appear as a conflict of interest, and disclose to ES Group if any ES Group employee or professional under contract with ES Group may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

#### Competition

Suppliers will comply with all applicable laws regarding fair competition and antitrust.

#### Trade Sanctions and Export Controls

ES complies with all applicable international trade laws and regulations, and we expect Suppliers to comply with all trade and export control laws that apply to their work with ES.

#### Grievance mechanisms

The Supplier shall have systems in place enabling anonymous grievances, reporting and management. A designated officer shall continuously monitor the grievance mechanism, keep records on the issues raised and take appropriate actions on a confidential manner.

#### Records

The Supplier shall maintain transparent and up to date books and records to demonstrate compliance with applicable materials, services, governmental and industry regulations.

#### Origin

The Supplier shall be capable to disclose all the potential sources of primary origins (country of origin) associated with deliveries made. ES Group reserves the right to ask the Supplier to create, at a point of time, full supply chain mapping back to origin to facilitate assessment of upstream supply chain compliance.

ES encourages Suppliers to understand, and take appropriate steps to address, human rights, environmental and ethics issues in their supply chains. Upon request, ES expects its Suppliers to share with ES information regarding their relevant supply chain policies and practices, conditions or risks in their supply chains, and how such conditions or risks are being prevented or addressed. If requested by any public authority to ES, Suppliers agree to disclose to ES information related to their supply chain, including countries of origin of materials used in products supplied to ES – ES reserves the right to disclose this information publicly only if requested by law.

#### Duty of Secrecy

Information owned by the ES Group and disclosed to the Supplier shall, as a general rule, be deemed to be private/secret or confidential information, unless agreed differently in a framework agreement duly executed between the Parties.

Suppliers and all of their respective professionals shall be responsible for adopting adequate security measures to protect such private/secret and confidential information.

The information provided by suppliers to their contacts within the Group shall be true and shall not be given with the intent to induce any deception.

#### Intellectual property

Unless differently agreed in writing between the Parties, Suppliers must safeguard and take necessary steps to protect ES's and its clients' proprietary intellectual property, even if it is public. This includes trademarks, patents, copyrights, inventions, and other proprietary works. Suppliers must only use such intellectual property for the purposes authorized in a contractual agreement. If you are uncertain about a proposed use of ES's or its clients' intellectual property, seek ES guidance.

#### Privacy and data protection

In general terms, Suppliers undertake to comply in all respects with applicable data protection and privacy legislation and never disclose Personal Information to anyone outside of ES except as permitted by law and in the proper conduct of our business, where disclosure is required by legal process or with ES's legal approval.

Any question related to General Data Protection Regulation (GDPR) and/or privacy can be addressed to the below contact: [gdpr@europesnacks.com](mailto:gdpr@europesnacks.com).

### Subcontracting

Suppliers shall be responsible for ensuring that their own suppliers and subcontractors are subject to principles of conduct equivalent to those established in this Code.

The actions performed and the procedures used by any suppliers to comply with their obligations towards ES may not entail an indirect or intermediate violation of this Code, the corporate policies or the other rules of the Governance.

### Communications

Unless agreed differently in writing between the Parties, Suppliers may not publish any marketing materials, press releases, or media interviews that include a reference to ES, its clients, or the work being completed together without ES's prior written approval.

### I. Reporting Violations

Suppliers will have in place appropriate policies, management systems, procedures, and staffing to meet the expectations in the Code. Suppliers will communicate to workers the standards to which it is committed, as well as relevant laws, regulations and protections. The Supplier shall report and notify any breach of the Code, any actual or suspected legal infractions, including any legal actions against the Supplier by the authorities for violations of human rights, environmental laws, or anti-corruption or bribery laws. Violations should be reported to the ES contact person, or can be reported confidentially using this email: [corporate.compliance@europesnacks.com](mailto:corporate.compliance@europesnacks.com)

In accordance with the following legal requirements :

- Law Sapin II and its decree n ° 2017-564 of 19 April 2017 in France.
- Law 2/2023, of 20 February, regulating the protection of persons reporting regulatory infringements in Spain.
- Public Interest Disclosure Act 1998 ("PIDA") incorporated into the Employment Rights Act 1996 ("ERA") in the UK which gives whistleblowers comprehensive protection.

If a supplier believes, in good faith, that a law, a regulation or any of the principles set out in this Code of Ethics is violated or is about to be violated, he/she may report freely, in compliance with the rules applicable in the country where he/she resides and carries out his/her activities.

That is, if a supplier, disinterestedly and in good faith, has any doubts or suspicions about possible illicit practices in the following areas:

- financial, accounting, banking and anti-corruption;
- anti-competitive practices
- anti-discrimination and anti-harassment at work
- health, hygiene and safety at work
- food safety
- environmental protection,
- conflict of interest

Moreover, if a supplier, in a disinterested and bona fide manner, has any doubt or suspicion concerning possible unlawful practices in the following areas:

- financial, accounting, banking and the fight against corruption;
- anti-competitive practices;
- combating discrimination and harassment at work;
- health, hygiene and safety at work;
- protecting the environmental,

He/She may (but is under no circumstances obliged to) report to his/her supervisor (direct or indirect) or use a secure reporting system described below.

#### Collection of warning/reporting

A secure whistleblowing system, named Whistleblower Software, will be open to all external persons working with Europe Snacks Group to submit reports, and will no longer be limited or substituted to reporting to their supervisor.

The Whistleblower Software whistleblowing channel will ensure:

- Anonymous reporting of serious matters: you will be able to submit information on reprehensible matters or report actions that are unethical, illegal or in violation of internal policies.
- Confidential handling of the report: all enquiries are handled confidentially and securely.
- Oral or written reports
- Report in the language you are most comfortable with
- Track the status of your report
- Add any information to your report
- GDPR compliance

If a supplier believes, in good faith, that a law, a regulation or any of the principles set out in this Code of Ethics has been violated or is about to be violated, he/she may freely report it to his/her superior, or on the Whistleblowing Channel link on the Group's website <https://www.europesnacks.com/>, under the page in the "Whistleblowing" section referring to the Whistleblowing Channel, in accordance with the rules applicable in the country in which he/she resides and carries out his/her activities.

Alerts and complaints are brought to the attention of the Committee managing the Whistleblowing Channel (the "referrer" within the meaning of the law, or the "Whistleblower Protection Officer" as mentioned in the Whistleblowing Policy of the Group). The author of the alert/whistleblowing must describe, orally or in writing, the facts, data or documents, regardless of their form or medium, on which the alert is based and, where appropriate, allow for an exchange of views with the addressee of the alert.

All whistleblowers may remain anonymous at all times.

Allegations must contain the following information in order to be accepted:

- Truthful and accurate arguments or evidence.
- Person or group denounced

#### Processing of Warning/Reports

All the process is described in the Whistleblowing Policy of the Group and within the Manual of Whistleblowing enclosed to the Whistleblower Software channel page.

Any Warning/Report, which reveals fraudulent behavior, significant failure or inadequacy of internal control, results in corrective actions and/or disciplinary sanctions and/or prosecution.

An alternative process to report breach of competition law has been implemented by the respective Competition Authorities from EU and UK. Thus, before the Authorities, reports must necessarily concern a violation of the rules prohibiting anti-competitive practices (cartels, abuse of dominant position, etc.) and State aids. This new tool is in addition to the Authorities clemency program. It will enable whistleblowers to inform the Competition Authorities directly without having to go through internal reporting within their company.

II. **Supplier's Acknowledgement** (If required by the ES Purchasing Department)

We, the undersigned hereby confirm that:

- We have received and taken due note of the contents of the ES Supplier Code of 2026,
- We are aware of all relevant laws and regulations of the countries in which our company operates,
- We will report to ES Group any case of violations of the Code.
- We will comply with the ES Supplier Code requirements based on a development oriented approach and without amendment or abrogation.
- We will inform all of our employees/subcontractors of the content of the ES Supplier Code, and that we will ensure that they also comply with the provisions incorporated therein.
- We hereby authorize ES Group or any organizations acting on behalf of ES Group to carry out audits with or without notice at our premises and the business premises of our subcontractors at any time to verify compliance with the ES Supplier Code content.

Name of Company

Name and Title

Signature

Company Stamp/Seal

Company's Business Registration/Statutory ID/Code/Number

Date & Place

This document must be signed by an authorized representative of the Supplier & returned to the requesting ES Purchasing Department.