

Code of ethics

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Definition and purpose of the code of ethics/ code of conduct

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definition and purpose of the code of ethics/ code of conduct

The Code of Ethics sets out the principles, criteria and rules of conduct by which the employees of Unexport, S. Coop. shall abide in the development of their professional activities, therefore constituting a basic pillar of the company's compliance programme that promotes and reflects positive corporate culture.

The purpose of this Code is to establish the principles and values that shall govern the company's activities and those of all its employees in order to ensure ethical and responsible professional behaviour in the performance of our activity, while laying down the company's commitment to business ethics and transparency principles.

The Code of Ethics is binding and contains provisions aimed at making it effective. This includes obligations, so any infringement of the Code and policies implementing it shall give rise to disciplinary sanctions.

The Code is based on values, enhances the company's reputation, provides unity and coherence within, and defines its corporate culture to third parties.

The Code of Conduct is complementary to the company's internal procedures, rules and legal regulations.

If there are internal procedures, laws or practices applicable to the natural and legal persons subject to this Code that are stricter than its provisions, then the former shall prevail.

The Code takes into account the principle of criminal liability of legal persons and provides the basis for avoiding irregular and improper conduct that may determine the company's criminal liability, as well as other conducts contravening the company's principles and values.



Scope of application

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Scope of application

This Code of Conduct contains the rules of conduct that shall govern all Unexport, S. Coop., employee actions, and constitutes a main element of the Unexport, S. Coop., Compliance Programme.

Its purpose is to establish the principles and values that shall govern the company's activities and those of all its employees in order to ensure ethical and responsible professional behaviour in the performance of their activity, while laying down the company's commitment to the principles of business ethics and transparency.

This Code can be justified in the company's managerial competence, and is subject to limits, such as respect for human rights, the need for it to be exercised in a proportionate manner and the limits of labour regulations. It is applicable to all personnel, regardless of their position or duties. It applies, therefore, to cooperative members, senior management and all employees of Unexport, S. Coop., including trainees and interns. External advisors, self-employed workers and temporary employees shall also be bound when providing services for the company.

The Code also binds the company regarding the employee since the statements made in the Code create legitimate expectations of behaviour that must become part of the company's obligations in accordance with good faith in the workplace.

In the external field, the application of the Code may be extended to the natural and legal persons with whom the company has relations, and, in particular, to suppliers or associated companies, collaborators and customers. The company shall foster among its suppliers and collaborating companies the adoption of behavioural guidelines consistent with those defined in this Code and may request them to formalize their commitment to comply with it.



The company's mission, vision and values

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The company's mission, vision and values

3.1 Mission

The very nature of Unexport, S. Coop., a second-degree cooperative, defines the company's mission, as cooperatives are not profit oriented, which is why it redirects its efforts to provide the best service to the member creating a commercial network through the synergy of unifying produce, services, resources and efforts, thus allowing its products to be marketed in the best possible destinations, being the perfect commercial complement for the members' production.

On the other hand, it seeks to provide these destinations and customers with the maximum guarantees in terms of product, service and quality so we can be a benchmark in international market distribution channels.

3.2 Vision

Unexport, S. Coop., aims to attain a development level that allows it to create a business portfolio according to the defined target customer and cover its needs by coordinating its own resources and those of the members as efficiently as possible, becoming the main total production marketing channel.



3.3 Values

3.3.1 Quality and Safety

Maximum food safety and quality of our products, as a commitment to consumers.

Through strict compliance with current legislation, we monitor our Quality Management System in collaboration with our members' developed and advanced quality management systems.

3.3.2 Commitment

The best provision of services to our Customers and Members through growth and continuous improvement in the development of our activity.



3.3.3 Occupational Welfare

Ensuring labour and health protection and the well-being of our workers for the care and protection of this value, since Unexport, S. Coop., has a human team with extensive knowledge that allows to cover the cases presented adapting to the work systems required by the customer.

3.3.4 Accountability and Transparency

Commitment to Corporate Social Responsibility, the guiding principles and Sustainable Development Goals set by the United Nations in economic, social, environmental, human rights and anti-corruption matters.

Operating principles

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Operating principles

4.1 Internal Relations

The greatest asset of Unexport, S. Coop., are its employees and they shall be considered as such. The company shall promote the personal and professional development of its members and foster the existence of a positive working environment.

Any type of promotion shall respond to the principles of merit and ability defined in the post requirements, the company ensuring equal opportunities and the promotion of a corporate merit-based culture.

The company shall ensure compliance with labour law in the field of employment. Employees shall collaborate in the fulfilment of these objectives, preventing, detecting and reporting any irregularities they may detect.

Special attention shall be paid to the labour integration of people with disabilities or handicaps.

4.1.1 Respect for the Individual

All Unexport, S. Coop., employees shall promote at all times relationships based on respect for others and reciprocal collaboration.

Unexport, S. Coop., undertakes to ensure the working environment is free of any type of violence and / or harassment, with the consequent prohibition of all types of discrimination, intimidation and offensive or improper behaviour, disrespect or any type of physical or verbal aggression in professional relationships within the Company.

We promote the same values when dealing with suppliers, associates, customers and stakeholders. Unexport, S. Coop., shall not maintain commercial relations, or those of any kind, with parties that consent to human trafficking, labour exploitation or child labour.



4.1.2 Principle of Equality and Non-discrimination

The basic principle of Unexport, S. Coop., is to maintain a working environment in which the dignity of all persons is respected as well as the avoidance of any type of conduct that violates the fundamental rights protected by the Spanish Constitution and the general legal system. Unexport, S. Coop., expresses its firm commitment to the principle of promoting equal opportunities in access to work and professional promotion, avoiding at all times situations of discrimination or inequality based on gender, race, social or sexual status, marital status, religion, trade union membership or any other circumstance.

Unexport, S. Coop., shall ensure access to measures that facilitate the reconciliation of professional and personal life, in order to improve the quality of life of employees and their families.



4.1.3 Occupational Risk Prevention

Unexport, S. Coop., prioritizes the safety and health of its employees in all its decisions, promotes the development of good practices in this area as well as the adoption of preventive measures in order to ensure that functions are carried out in a safe and healthy environment. Management and middle management personnel must know and inform the people in charge of the safety aspects related to their task, so lack of knowledge shall not be a risk justification factor. Likewise, they shall inform the company of any training needs that they deem necessary.

Employees shall at all times respect the applicable occupational safety and health preventive measures. To this end, they have the obligation to know and use the resources that Unexport, S. Coop., puts at their disposal in terms of safety and prevention of occupational risks and, where appropriate, ensure that the members of their teams carry out their activities in safe conditions.

The company shall require the suppliers with which it collaborates to comply with occupational risk prevention regulations, as established in the applicable regulations.

4.1.4 Conflicts of Interest

Employees shall always act in a way that their individual interests, those of their relatives or other persons related to them do not take precedence over those of the company or its customers. This behaviour shall apply both in relations with Unexport, S. Coop., and with its customers, suppliers or any other third party

Employees shall identify and report both potential and actual conflict of interest situations, including those arising from kinship or other related relationships. They shall refrain from participating (either in decision-making, or in company representing functions) in transactions of any kind in which any self-interest or that of a related party concurs. Accordingly, and without prejudice to that general rule:

- They shall not acquire or transfer assets or goods belonging to the company, either directly or through related parties.
- They shall not give special treatment or working conditions based on personal or family relationships.

In the event of doubt as to whether an activity to be carried out may entail a conflict of interest, the Compliance Committee shall be consulted.

4.1.5 Información Privilegiada

Employees who have insider information shall not carry out transactions on their own account or for others, directly or indirectly, in the securities or instruments affected by them. Nor shall they promote, protect or recommend that others perform them.

Insider information is considered to be any information of a specific nature which has not been made public, and which, if made public, could have a significant influence on the quotation on a market or organised procurement system.



4.1.6 Acceptance of Gifts

It is forbidden for employees to accept any type of income or commissions for operations carried out by the company or to otherwise obtain benefit from the position held in it for their own benefit. Thus, any invitation, gift or attention that due to its nature, frequency, characteristics or circumstances may be interpreted as being made with the intention to influence the recipient's objectivity shall be rejected and brought to the attention of the Compliance Committee.



Consequently, no employee shall accept gifts, invitations, favours or any other type of compensation related to their professional activity at Unexport, S. Coop., and which comes from customers, suppliers, intermediaries, counterparties or any other third party. The following are not included in this limitation:

- Promotional and advertising material of little value.
- Normal invitations that do not exceed the limits considered reasonable in customary social practices.
- Occasional attentions for specific and exceptional reasons, provided they are not in cash and are within reasonable limits.

In any case, employees shall ask the management for authorization regarding any gift, invitation or attention.

4.2 External Relations

4.2.1 Relations with Customers

The company and every one of its members undertake to comply with competition regulations, avoiding any practice that limits or restricts it.

In this sense, the company and every one of its members shall ensure that they offer truthful information in corporate promotion activities, without being allowed to offer false information to customers that may mislead them. Any type of misleading advertising is also prohibited, always acting loyally. Competitor information that could reach the company violating confidentiality shall be rejected.

The security of payment means, data protection and the prevention of fraud shall be ensured.

Any employee incorporating any type of information into the company's computer systems must ensure that it is reliable and rigorous.

4.2.2 Relations with Members

Unexport, S. Coop., is a second-degree cooperative made up of several first-degree cooperatives. It has bylaws where the corporate purpose and the different relationship protocols with associates are defined.

In accordance with the principles of transparency, relevance and veracity, Unexport, S. Coop., undertakes to disseminate the faithful image of its financial statements as a reflection of the annual audits that are carried out on them.

To meet the expectations of our members, the company management shall be based on the continuous modification and revision of our corporate strategies, adapting our business to the changes that occur in the environment, adopting a dynamic position in the market that allows us to take advantage of the sector's opportunities, and developing the necessary strategies to guarantee farmland viability.

4.2.3 Relations with Suppliers

Ethics and respect shall prevail in the relations with suppliers, who shall be selected according to objective and transparent criteria.

In this case, respect for the Code of Ethics shall form part of a supply or service contract and its breach may result in the possibility of cancelling the contract.

Internal purchasing procedures shall be strictly respected, justifying decisions and preserving related documentation for possible internal or external control. Extreme diligence shall be taken in the protection of the suppliers' confidential information.

Suppliers must commit to respecting human and labour rights in their own companies.

It is expressly forbidden to accept, offer, or request, either directly or indirectly, gifts, favours or any type of compensation that may influence decision-making in relation to the supply chain. The reception or offer of gifts of little value shall be allowed. The management shall be consulted about any doubt regarding what is included in this concept. In any case, cash gifts shall be prohibited.

Any employee taking part in supplier and external collaborator selection processes has the obligation to act objectively and impartially, applying transparent criteria and complying with internal regulations on the matter.

4.2.4 Relations with Institutions, Authorities, Officials

International regulations for the prevention of corruption and bribery shall prevail in company member relations with public authorities, institutions and officials.

Any decision taken in this area must respect the applicable internal and external rules and shall be documented for the purpose of its possible internal or external control.

Under no circumstances shall the company offer, request or accept gifts, favours or compensation from authorities, institutions or officials. Gifts or details of little value, proportionate and reasonable in accordance with local practice, shall be exempt from this rule. In any case, cash gifts shall be prohibited.

Payments to expedite any type of processing are prohibited.

Thorough and expressly vigilant control shall be maintained in the fulfilment of obligations derived from the granting of any type of subsidy or aid.

4.2.5 Corporate Image and Reputation

The company considers its corporate image and reputation as a very valuable asset to preserve the trust of its shareholders, employees, customers, suppliers, authorities and society in general. Unexport, S. Coop., employees must take the utmost care to preserve the image and reputation of Unexport, S. Coop., in all their professional activities.

4.2.6 Third-Party Gifts, Commissions or Remuneration Policy

Giving or receiving gifts and invitations to recreational activities may affect objectivity and criteria, as well as infringe anti-corruption and bribery regulations and laws in extreme cases, so every member of the company shall act very diligently in this matter.

Requesting and accepting any type of payment, gift or commission in relation to the professional activity and coming from customers, intermediaries, suppliers or third parties is prohibited. Invitations, promotional items, occasional attentions or details that are not in cash and within reasonable limits are excluded from this prohibition. If you have any questions in this regard, the management must be consulted.

4.2.7 Participation in External Courses and Seminars

Participation as speakers in external courses or seminars shall require the prior authorization of the manager of the corresponding area when acting as a representative of, or due to the function exercised in, the company.

4.2.8 Relations with the Media

Employees shall refrain from disclosing to the media, whether on their own initiative or at the request of third parties, any information or news regarding the company or related to third parties, and in these cases must inform the area responsible for external communication. They shall also avoid the dissemination of comments or rumours.

4.2.9 Political or Membership Activities

Any relation to, membership of, or collaboration with political parties or with other types of entities, institutions or associations for public purposes or that exceed those of Unexport, S. Coop., as well as contributions or services to them, if applicable, must be made in a way that it is clear and unequivocal that they are carried out exclusively in a personal capacity, avoiding any possible interpretation of relationship or association with Unexport, S. Coop.

In any case, employees wishing to accept any public office must inform their area manager and the Compliance Committee whenever the performance of the public office in question may directly or indirectly affect the activity carried out in Unexport, S. Coop.

Data protection policy

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Data protection

Confidentiality and diligence in the use of data shall preside over the actions of the recipients of this Code. This principle must be respected even when the relationship with the company has ended.

The company's information shall not be used for private benefit, nor communicated to third parties; it shall be considered confidential and must be used for the exclusive purpose for which it was obtained. Confidential information includes professional secrets, pricing regulations, strategic or business operational plans, new products, contracts, agreements, lists of employees, customers, suppliers, software or computer programmes, information on human resources, personnel plans, internal communications, subscription lists and, in general, data affected by data protection regulations.

Information that might become known for any reason or circumstance regarding other employees, Members and Directors, including, where appropriate, that relating to any personal or family data, remuneration or information related to health, in addition to being subject to professional secrecy, being of a personal nature, is sensitive data and, therefore, specially protected by the European Union General Data Protection Regulation and the Law on the Protection of Personal Data and Guarantee of Digital Rights.

Respect for the personal and family privacy of the people whose data is accessed is required.

All personnel must know and respect the company's internal procedures on data storage, custody and access.

Any user who becomes aware of an incident is responsible for recording it in the Book or Electronic Register of Data Processing Incidents or, where appropriate, for sending written communication to the person in charge of security or the party responsible for processing.



Industrial & intellectual property rights

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Industrial and intellectual property rights

The company recognizes its commitment to the protection of copyrights, patents and trademarks, both its own and those of others, and requires its service providers to make the same commitment.

The Compliance Committee shall be informed of any incident related to the company's intellectual and industrial property. Particular attention shall be paid to the inclusion of copyright notices in the materials, information, products, services and any of the company's documents intended for public distribution.

Employees shall respect the intellectual property and the corresponding right of use regarding computer programmes and systems; equipment, manuals and videos; knowledge, processes, technology, know-how and, in general, other works developed or created in the company. Therefore, their use shall be made in the exercise of the professional activity and all the material on which they are supported shall be returned when required.

Employees shall respect the principle of strict confidentiality regarding the characteristics of the rights, licences, programmes, systems and technological know-how, in general, of which Unexport, S. Coop., is the owner or holds the exploitation rights or rights of use.

Employees must not exploit, reproduce, replicate or assign the company's computer systems and applications for other purposes, whether said activity is remunerated or not and though said activity is carried out using any of the Company's systems, means or computer applications, even if outside the employee's working hours.

They shall not use the image, name, trademarks or logo of Unexport, S. Coop., except for the proper development of their professional activity.

In their relationship with third parties, employees shall strictly follow the rules and procedures in this matter to avoid infringing third-party rights, and respect other parties' valid intellectual property rights.



Code of conduct implementation

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Code of conduct implementation

7.1 Compliance Committee

To ensure compliance with this Code and the compliance system, Unexport, S. Coop., has created the Compliance Committee, which shall be the maximum responsible for the System.

The Committee's functions shall be to:

- Apply this Code and the rules and procedures that develop it.
- Investigate complaints, process and propose the resolution of cases related to the possible commission of acts contrary to law, to this Code or the Compliance Programme.
- Submit to the Steering Committee's approval the procedures and rules that are issued in the development of the Compliance Programme.
- Determine the contents and plan the training regarding the Compliance Programme.
- Inform and advise on any doubts that may arise from the application of the Compliance Programme.
- Prepare periodic reports on the measures adopted, particularly those aimed at the prevention of offences and administrative sanctions.
- Adapt the Compliance Programme to the company's future activities, to the new areas of risk that arise and to any changes in legislation and jurisprudence.
- Prepare an annual report on the Compliance Programme and suggest improvements.

The Steering Committee shall approve this Code and any other internal regulations or codes of conduct.

The Committee shall hold one ordinary meeting at least once a year and on an extraordinary basis whenever deemed necessary by the Steering Committee or proposed jointly by two full members.

7.2 Responsible Channel

Personnel, supplying companies, providers, customers and external collaborators who are aware of any irregular situation or the commission of acts contrary to law or the provisions of this Code and / or its implementing regulations, can report it:

- Personally to any member of the Regulatory Compliance Committee.
- Using the form enabled in an application on the corporate website.

This same channel may be used to ask questions or raise doubts about the interpretation or application of the Code and / or the Compliance Programme. Any complaints submitted shall be confidential and the identity of the complainant shall be kept confidential. The fraudulent use of the complaint channel, through false or bad faith allegations, shall lead to the appropriate disciplinary measures.

All employees are encouraged to use this communication channel to submit any complaints, doubts, requests for advice or information and to make as many suggestions they deem necessary in order to comply with the principles and values of this Code.

The Compliance Committee is responsible for making the Code of Conduct available to employees, for organizing training for their adequate knowledge and for interpreting and generally dealing with the queries raised by employees.

The complaint channel is available on the cooperative's website at www.unexport.es.



7.3 Knowledge, Acceptance and Compliance

The Code of Ethics is of mandatory compliance for all company employees and for those third parties that have voluntarily undertaken to comply with it.

The Code of Ethics shall be made known to all company members, who shall be obliged to attend the training sessions arranged for this purpose.

The Management shall participate in training programmes, sharing sessions with employees or taking part in them as a way to show the importance of regulatory compliance. Likewise, it shall provide all the necessary means to disseminate company values and principles and enforce the conduct guidelines contained in the Code. Their behaviour and level of compliance with the Code shall constitute a benchmark.

The Code must be expressly accepted by the personnel and each of the recipients shall be duly informed, so that the principles and values making it up shall govern the conduct of its recipients.

All company members shall confirm they have had access to this Code, that they accept it and understand what it implies. To this end, a record shall be kept of the employees' consents received. In this sense, an acknowledgment of receipt in the appropriate form shall suffice.

No member of the company, regardless of their level or position, is authorized to request an employee to contravene the provisions of this Code of Ethics, and no one may justify their conduct on the basis of an order from a superior or due to lack of knowledge of this Code.

7.4 Non-compliance

The behaviour of all professionals must comply with this Code; they shall maintain a collaborative and responsible attitude in the identification of situations of real or potential non-compliance with the ethical principles and standards of conduct contained in this Code, and report them to the Compliance Committee through the channels established in the previous point. Failure to comply with the Code may result in the application of the sanctioning regime established in current labour regulations, without prejudice to any administrative or criminal sanctions that, where appropriate, may be applicable.

All employees joining Unexport, S. Coop., must accept the principles established in this Code. The company may request its employees to confirm compliance with the Code on a regular basis.

Infringement, non-observance or tolerance of non-compliance with the Code could constitute a serious breach of the employment contract. When the Compliance Committee determines that a person has acted in a manner contrary to this Code, it shall entrust the Human Resources Management, providing the appropriate information, with the application of the corresponding disciplinary measures, according to the offences and sanctions system provided for in the labour regulations, and where appropriate, the corresponding legal actions shall be taken.

7.5 Approval and Validity

The Code shall enter into force on the day following its approval by the cooperative's Steering Committee. It shall be updated periodically, taking into account the suggestions and proposals made by the personnel and the collaborating parties. It shall also be revised when relevant breaches of its provisions become apparent, or when there are changes in the company, in the control structure or in the activity carried out that make it necessary.

