

STAKEHOLDER CODE OF ETHICS AND CONDUCT



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1. INTRODUCTION

Gourmet Catering & Eventos (hereinafter also referred to as the "**Group**") is a group of companies with more than 75 years of experience in the gastronomy and events industry. It currently operates one of the largest gastronomic Research, Development and Innovation (R&D&I) departments in the Valencian Community, together with a sustainable production and innovation centre covering more than **1,600 m²**.

Gourmet Catering & Eventos began its catering operations in several of Valencia's most emblematic historic venues and has since consolidated its presence in some of the most prestigious locations throughout the Valencian Community. Today, the Group operates in leading venues across Valencia, the Valencian Community and the Region of Murcia, as well as in other locations throughout Spain.

The Group employs more than **140 professionals** committed to creating and delivering outstanding gastronomic experiences and events. Within the hospitality and events sector, it provides a range of specialised services, including:

- Weddings and private celebrations
- Corporate, MICE and institutional events

Gourmet Catering & Eventos operates exclusively in a number of prestigious venues, including **Vallesa de Mandor, Cartuja de Ara Christi, Masía del Carmen, Huerto de San Vicente, Valencia Conference Centre (Palacio de Congresos de Valencia), Palau de les Arts Reina Sofía, Hotel Las Arenas, Parque de la Marquésa, and Víctor Villegas Auditorium and Conference Centre**, the latter two located in the Region of Murcia.

The Group also provides catering services in prominent public and private venues throughout the Valencian Community, including **Museo Príncipe Felipe, L'Hemisfèric, Palacio de la Exposición, Feria Valencia and La Mare Que Va (Asindown)**, among others.

Today, Gourmet Catering & Eventos continues its process of growth and geographical expansion, providing services to both national and international clients, delivering more than **2,500 events** each year and serving over **360,000 guests**. The Group promotes responsible business practices that take into account the social, economic and environmental impact of its activities. Furthermore, it maintains a strong commitment to inclusion, equal opportunities and professional development, fostering diverse, safe and respectful workplaces while promoting initiatives aimed at the social and labour-market inclusion of people at risk of social exclusion.

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2. PURPOSE AND SCOPE

Within this context, this **Code of Ethics and Conduct** (hereinafter, the "**Code**") serves as a framework for ethical behaviour intended to guide the conduct of everyone working within Gourmet Catering & Eventos.

Together with the Group's internal regulations, corporate policies and operating procedures, the Code aims to ensure that all professional relationships are conducted responsibly, ethically and consistently with the organisation's values. It establishes the standards of ethical conduct expected from all employees in the performance of their daily duties and in their relationships with clients, suppliers, managers, colleagues and all other stakeholders.

The Code is based on Gourmet Catering & Eventos' **Mission, Vision, Values and Principles**. Its primary objective is to promote an ethical corporate culture founded upon these principles while providing practical guidance to support responsible decision-making in everyday professional activities.

The Code also reflects Gourmet Catering & Eventos' firm commitment to its stakeholders, including employees, suppliers, external partners, shareholders, public and private institutions and society as a whole, defining the ethical framework that governs its management practices, decision-making processes and business activities.

This Code is intended to be a living document. The standards set out herein represent a starting point and shall evolve in response to changes in the legal, social and business environment.

All natural and legal persons maintaining employment, commercial, social or industrial relationships with Gourmet Catering & Eventos shall be treated with respect, dignity and fairness, based on mutual trust and the expectation of reciprocal conduct consistent with the principles established in this Code.

3. SCOPE OF APPLICATION

This Code applies to the entire organisation and is promoted by the Group's General Management. It is addressed to directors, managers and, in general, all employees of Gourmet Catering & Eventos, irrespective of their position, workplace, contractual relationship or any other employment condition.

Compliance with this Code is mandatory for directors, managers and employees alike.

Where appropriate, Gourmet Catering & Eventos may also require suppliers, business partners and other counterparties to formally commit to complying with the principles contained in this Code. Likewise, the application of the Code may be extended to any

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individual or organisation associated with Gourmet Catering & Eventos whenever the nature of the relationship makes this appropriate.

The General Management of Gourmet Catering & Eventos shall take all necessary measures to communicate the Company's Mission, Vision, Values and Principles and to ensure compliance with the standards of conduct and ethical behaviour established in this Code.

4. VISION

"To be recognised as a leading company in the gastronomy and events industry at both national and international level, distinguished by the excellence of our services, our commitment to innovation and sustainability, and our ability to create unique experiences in exceptional venues."

Gourmet Catering & Eventos aspires to consolidate a sustainable growth model founded on quality, creativity and continual improvement, while maintaining a firm commitment to people, the environment and society.

The organisation strives to create long-term value for its clients, partners and stakeholders by promoting a responsible, innovative and excellence-driven corporate culture.

5. MISSION

"To deliver outstanding, personalised and sustainable gastronomic experiences and events, including those held in unique and iconic venues, by combining innovation, creativity and service excellence in order to generate value for our clients, partners and society."

Gourmet Catering & Eventos conducts its business with a strong customer focus, adapting each project to the specific requirements of every client through creative gastronomy, highly professional service and comprehensive event management.

The Group operates in accordance with the principles of quality, sustainability, corporate social responsibility and continuous innovation, promoting locally sourced seasonal produce, respect for the environment and operational excellence.

The company is supported by a highly qualified, multidisciplinary team that advises and accompanies every client throughout the planning and delivery of each event, ensuring a distinctive experience founded on trust, personalised service, attention to detail and continual improvement.

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6. VALUES

COMPLIANCE WITH THE LAW

Gourmet Catering & Eventos considers compliance with applicable legislation to be a fundamental value and an essential pillar of its corporate culture. The Group is committed to ensuring that all individuals acting on its behalf conduct their activities in full compliance with the applicable legal and regulatory framework, while actively promoting a robust and effective culture of compliance throughout the organisation.

This commitment applies at every level of the Group and forms an integral part of its identity and business model.

All employees are required to comply at all times with applicable legislation, internal regulations and corporate policies approved by the Group. Likewise, they must refrain from engaging in any conduct which, although not constituting a legal infringement, could damage the organisation's reputation or adversely affect its legitimate interests, whether directly or indirectly.

In its relationships with clients, suppliers and end consumers, Gourmet Catering & Eventos is committed to acting in full compliance with all applicable laws, regulations and procedures, guaranteeing neutrality, objectivity and equal treatment, while fostering relationships based on trust, transparency and professional integrity.

GOOD FAITH

Everyone acting on behalf of Gourmet Catering & Eventos shall perform their duties with honesty, loyalty and good faith, both in their relationships within the Group and in their dealings with managers, colleagues, clients, suppliers, business partners and any other third parties.

Ethical conduct is considered essential to maintaining an environment of trust, mutual respect and shared responsibility, both within the organisation and in all external relationships.

ANTI-BRIBERY, ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

Gourmet Catering & Eventos operates a **zero-tolerance policy** towards bribery, corruption, extortion, embezzlement, fraud, money laundering and the financing of terrorism. Direct or indirect involvement in any such activities is strictly prohibited.

The Group, together with all its employees, managers and business partners, undertakes to act at all times with integrity, transparency and due diligence, in full compliance with

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all applicable legislation relating to anti-bribery, anti-corruption, anti-money laundering and counter-terrorist financing, as well as with the Group's internal policies.

In particular:

- Offering, promising, authorising, requesting or accepting improper payments, gifts, benefits or advantages of any kind intended to improperly influence decision-making is strictly prohibited.
- A risk-based approach shall be adopted when selecting and managing relationships with clients, suppliers and third parties, applying appropriate due diligence procedures to prevent the Group from being used for unlawful purposes.
- Employees are expected to identify, prevent and report any indication or suspicion of irregular conduct through the internal reporting channels established by the organisation, cooperating fully with any subsequent investigation.
- The Group shall ensure the traceability, transparency and accuracy of all financial and accounting transactions, preventing unjustified cash payments, opaque structures or any practices that could facilitate money laundering or financial crime.

RESPECT FOR HUMAN RIGHTS

Gourmet Catering & Eventos is committed to respecting internationally recognised Human Rights, as enshrined in the Spanish Constitution and the **United Nations Universal Declaration of Human Rights**.

The Group is committed to promoting awareness throughout the organisation of its contribution to the **United Nations Sustainable Development Goals (SDGs)**.

Where appropriate, suppliers may be required to demonstrate compliance with internationally recognised Human Rights standards as part of the Group's supplier due diligence process.

CHILD LABOUR AND YOUNG WORKERS

The Group is committed to full compliance with all applicable legislation governing the minimum legal working age and guarantees that child labour shall never be used under any circumstances.

Furthermore, Gourmet Catering & Eventos undertakes to comply with all applicable legislation, internationally recognised labour standards and Human Rights principles relating to employment practices.

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This includes the absolute prohibition of child labour, forced labour, compulsory labour, human trafficking and all forms of modern slavery throughout its own operations and supply chain.

WORKING HOURS

Gourmet Catering & Eventos is committed to complying with all applicable local legislation governing standard working hours and overtime practices.

The Group guarantees employees adequate rest and recovery periods in order to safeguard their health, safety and long-term wellbeing. This includes strict compliance with legal limits on daily and weekly working hours, the provision of mandatory rest breaks and fair compensation for overtime worked.

Through these commitments, Gourmet Catering & Eventos seeks to promote a balanced, supportive and sustainable working environment that places the wellbeing of its people at the centre of its operations.

WAGES AND BENEFITS

Gourmet Catering & Eventos is committed to full compliance with all applicable national labour legislation and relevant sector-specific collective agreements.

This commitment includes the timely and accurate payment of salaries and wages, the payment of all mandatory social security contributions and the provision of all statutory employment benefits to which employees are legally entitled.

FREEDOM OF ASSOCIATION

Gourmet Catering & Eventos recognises and respects the fundamental rights of employees to freedom of association and collective bargaining in accordance with applicable legislation and collective agreements.

The Group actively supports open, constructive and transparent social dialogue and works collaboratively with employee representatives to ensure these rights are fully respected and effectively exercised.

INCLUSION AND DIVERSITY

Gourmet Catering & Eventos is firmly committed to diversity, inclusion and equal opportunities.

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The Group is predominantly led by women occupying senior management and leadership positions. Currently, our workforce comprises approximately **55% women and 45% men**.

Recruitment and selection processes are conducted in a fair, transparent and inclusive manner, without discrimination on the grounds of gender, race, ethnic origin, religion, age, disability, sexual orientation, gender identity, political opinion or any other protected characteristic.

The Group promotes equal opportunities throughout the entire employee lifecycle, including recruitment, promotion, training, remuneration and professional development.

Gourmet Catering & Eventos also supports the professional integration of young people by providing access to their first employment opportunities together with continuous learning and development throughout their careers within the organisation.

Work-life balance is actively encouraged through flexible working arrangements and initiatives such as reduced summer working hours and other measures that support employees in balancing their professional and personal responsibilities.

The Group also collaborates with a number of non-profit organisations to promote the social and labour-market inclusion of people at risk of social exclusion.

HUMAN CAPITAL

The people who make up Gourmet Catering & Eventos represent one of the Group's greatest strengths and are the driving force behind its growth, operational excellence and capacity for innovation.

The organisation promotes a safe, diverse, collaborative and inclusive working environment that encourages continuous learning, equal opportunities, work-life balance and employee wellbeing.

Gourmet Catering & Eventos believes that talent, commitment and teamwork are essential to delivering outstanding service and creating exceptional experiences for its clients.

Accordingly, the Group promotes a corporate culture founded upon respect, responsibility, inclusion and recognition of the dedication and contribution made by every member of the organisation.

LEADERSHIP

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Gourmet Catering & Eventos promotes a leadership model based on integrity, accountability, accessibility and a genuine commitment to service.

The organisation is supported by highly qualified professionals who foster a collaborative working culture focused on excellence, employee engagement and continuous professional development.

The Group also maintains a strong commitment to equal opportunities, with women holding a significant proportion of leadership and management positions across the organisation.

Gourmet Catering & Eventos aims to maximise both the professional and personal development of its employees by fostering positive, respectful and high-performing workplaces.

Managers responsible for each venue and business area play a key role in coordinating teams, promoting the Group's corporate values and creating an environment that supports professional performance, innovation and continual improvement.

SUSTAINABILITY

Sustainability is an integral part of Gourmet Catering & Eventos' corporate strategy and management model and is embedded across all aspects of its operations.

The Group is committed to minimising the environmental, social and economic impacts arising from its activities through responsible business practices.

Gourmet Catering & Eventos promotes environmental stewardship, energy efficiency, circular economy principles and responsible consumption throughout its production, logistics and service delivery processes.

To this end, the Group prioritises locally sourced and seasonal products, sustainable materials and innovative solutions designed to reduce food waste and optimise resource efficiency.

The organisation also develops initiatives aimed at improving energy efficiency and reducing the environmental impact of its facilities and operations through energy-saving measures, renewable energy self-generation and responsible waste and wastewater management.

Furthermore, Gourmet Catering & Eventos actively promotes responsible gastronomy and a corporate culture committed to sustainability, collaborating with social organisations and institutions dedicated to social inclusion, food redistribution and the generation of positive social impact.

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CREATIVITY

Creativity is one of the defining characteristics of Gourmet Catering & Eventos and forms a fundamental pillar of its value proposition.

The Group is committed to gastronomic innovation and continual improvement, developing culinary concepts and experiences tailored to the specific needs and expectations of every client.

By combining gastronomic tradition, premium-quality ingredients, technical expertise and contemporary culinary techniques, Gourmet Catering & Eventos designs versatile, bespoke solutions that create memorable experiences.

The organisation actively encourages a culture of creativity, innovation and excellence through the continuous development of new ideas, processes and solutions for the gastronomy and events industry.

QUALITY

Quality is a core value at Gourmet Catering & Eventos and underpins every process and activity carried out across the Group.

The organisation is firmly committed to gastronomic excellence, professional service delivery and continual improvement, striving to meet and exceed client expectations while maintaining the highest standards of quality, hygiene and food safety.

Gourmet Catering & Eventos operates comprehensive internal quality assurance and food safety management systems, including HACCP-based procedures, monitoring mechanisms and preventive measures designed to guarantee traceability, consumer safety and compliance with applicable legislation.

The Group also invests continuously in the professional development of its teams, fostering a culture of excellence based on attention to detail, innovation, operational efficiency and continual improvement.

CUSTOMER FOCUS

Customer focus is one of the fundamental principles guiding Gourmet Catering & Eventos.

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The Group adopts a flexible, responsive and highly personalised approach, tailoring every service and culinary proposal to the individual needs, expectations and characteristics of each client and event.

Its objective is to deliver a seamless customer experience built upon gastronomic excellence, exceptional service quality, meticulous attention to detail and effective coordination throughout every stage of event planning and delivery.

To support continual improvement, Gourmet Catering & Eventos operates quality assurance mechanisms, customer satisfaction surveys and internal review procedures that enable the organisation to evaluate performance and enhance the customer experience on an ongoing basis.

LOYALTY AND CONFLICTS OF INTEREST

Conflicts of interest arise whenever the personal interests of an individual associated with the Group directly or indirectly conflict with the legitimate interests of any company within Gourmet Catering & Eventos or interfere with the objective, impartial and diligent performance of their professional duties.

All employees are expected to avoid situations that may give rise to actual, potential or perceived conflicts of interest and to act at all times with loyalty, integrity and in the best interests of the organisation.

Whenever uncertainty exists regarding the existence of a potential conflict of interest, employees must seek guidance through the Group's Whistleblowing Channel, available via the Gourmet Catering Whistleblowing Channel, in order to ensure that decisions are made in accordance with the Group's ethical principles and compliance framework.

7. PRINCIPLES OF ETHICAL CONDUCT

Gourmet Catering & Eventos believes that the trust placed in the Group by its approved suppliers, business partners and the communities in which it operates is founded upon the integrity, professionalism and responsibility demonstrated by each of its employees.

Integrity means acting ethically, honestly and in good faith.

Professional responsibility means performing duties proactively, efficiently and with a constant commitment to excellence, quality and service.

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Gourmet Catering & Eventos expects all employees to perform their duties with integrity and accountability. Likewise, the Group expects its approved suppliers and external business partners to conduct themselves in accordance with these same principles.

INFORMATION MANAGEMENT AND DOCUMENT SECURITY

All employees of Gourmet Catering & Eventos are required to treat as confidential any information relating to the Group to which they have access as a result of their employment or professional relationship.

Unless there is a legal, contractual or business requirement to retain documentation, documents must be securely destroyed. Employees are responsible for ensuring the proper filing, organisation and retention of documents only for the periods established by law or by the Group's internal policies.

Particular care must also be taken to ensure cybersecurity. Employees shall:

- use strong and secure passwords;
- store digital information exclusively within the internal systems designated by the Group;
- never store corporate information on personal devices or external storage media not authorised by the organisation.

Employees must also avoid opening suspicious emails, attachments or hyperlinks that may compromise the security of the Group's information systems.

Gourmet Catering & Eventos complies with all applicable data protection legislation in its capacity as Data Controller.

Personal data shall be processed solely for the purposes of managing, maintaining, monitoring and fulfilling contractual relationships. Data subjects may exercise their rights of access, rectification, erasure, objection, restriction of processing and data portability by submitting a written request to Gourmet Catering & Eventos.

RESPECT FOR PEOPLE

Gourmet Catering & Eventos rejects any form of physical, psychological or moral harassment, abuse of authority or any behaviour that may create an intimidating, hostile or offensive working environment or infringe the dignity or rights of individuals.

The Group has established a **Harassment Prevention Protocol**, covering sexual harassment, harassment based on sex and workplace harassment.

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Any employee who believes they have been subjected to harassment should follow the reporting procedure set out in the Protocol using whichever reporting mechanism is most appropriate at the time. Employees will always receive the support of the Human Resources Department throughout the process.

All employees are expected to treat one another with courtesy and respect, contributing to a pleasant, healthy and safe working environment.

Everyone has a duty to treat colleagues, managers and subordinates fairly, respectfully and professionally.

Similarly, relationships between Gourmet Catering & Eventos employees and the employees of suppliers, contractors, clients and other business partners must always be based on mutual respect, professionalism and cooperation.

Any corrective feedback regarding performance or conduct shall always be communicated privately and respectfully.

Whenever possible, such conversations shall take place only in the presence of the employee concerned and, where appropriate, their line manager or another authorised manager.

CODE OF CONDUCT

Gourmet Catering & Eventos has established a **Code of Conduct** that defines the standards of behaviour expected in the workplace.

Accordingly:

- We communicate with one another respectfully and courteously.
- Everyone must be treated fairly and with dignity.
- We are committed to promoting equal opportunities and preventing discrimination on the grounds of race, gender, religion, ideology, disability, age, sexual orientation or any other protected characteristic.
- Any corrective feedback from managers shall always be provided respectfully and discreetly. Bullying, intimidation or any form of harassment will not be tolerated.
- Any behaviour involving unwanted physical contact, sexual advances, inappropriate comments or any other form of inappropriate conduct is strictly prohibited.

HEALTH AND SAFETY

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Health and Safety is a strategic priority for Gourmet Catering & Eventos.

All employees, contractors and suppliers are required to comply fully with applicable Occupational Health and Safety legislation.

The Group has established procedures for coordinating business activities designed to ensure compliance with Health and Safety requirements, as well as the sustainability standards applicable to contractors and suppliers.

Gourmet Catering & Eventos promotes a safe, healthy and respectful working environment through preventive measures designed to minimise occupational risks.

The organisation carries out regular inspections and reviews of its facilities and equipment in order to strengthen workplace safety and continuously improve working conditions.

The Group promotes a strong prevention culture through training, awareness-raising initiatives and the provision of appropriate Personal Protective Equipment (PPE) wherever specific occupational risks exist.

The organisation also supports initiatives that promote employee health and wellbeing, encouraging healthy lifestyles and fostering a working environment based on respect, collaboration and care for people.

The Group actively promotes preventive policies aligned with current legislation and encourages suppliers and contractors to adopt equivalent Health and Safety standards.

Health and Safety is a shared responsibility.

Accordingly, every employee is expected to act responsibly and diligently to prevent situations that could endanger people, facilities or equipment.

In particular, employees must:

- correctly use all Personal Protective Equipment (PPE) provided by the organisation;
- properly use and respect all safety devices and protective measures installed in workplaces and equipment;
- immediately report any situation that may pose a risk to the health or safety of any person.

FOOD SAFETY

Gourmet Catering & Eventos maintains a firm commitment to quality, hygiene and food safety, implementing internal procedures designed to safeguard consumers and ensure compliance with all applicable legislation.

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The Group operates comprehensive Food Safety Management Systems based on HACCP (Hazard Analysis and Critical Control Points) principles, incorporating monitoring activities, records, verification procedures, internal audits and preventive measures designed to minimise risks associated with food production and service.

Where necessary, corrective and preventive actions are implemented to ensure the highest standards of quality and food safety throughout every stage of the production process.

The organisation continuously reviews and updates its food safety and hygiene procedures, promoting a culture of operational excellence and continual improvement across all venues and services.

CORPORATE REPUTATION, GIFTS AND HOSPITALITY

Gourmet Catering & Eventos considers its corporate image and reputation to be among its most valuable assets, underpinning the trust placed in the Group by its clients, employees, suppliers and society as a whole.

Accordingly, all employees are expected to act with the utmost diligence in protecting the Group's reputation in the performance of their duties.

Employees shall also ensure that the Group's corporate identity is used appropriately by third parties. Any public statement, participation in conferences, events, interviews, media appearances or social media activity undertaken on behalf of Gourmet Catering & Eventos must be authorised in advance.

Gifts and Hospitality

Within the framework of normal business practice, Gourmet Catering & Eventos permits the offering or acceptance of gifts, hospitality and business courtesies, provided that they:

- are reasonable, proportionate and consistent with accepted business practice;
- pursue a legitimate business purpose, such as business meetings or corporate events;
- are not intended to improperly influence any decision or obtain an undue advantage;
- are transparent and, where appropriate, recorded or declared in accordance with internal policies;
- do not involve cash, cash equivalents or personal benefits unrelated to legitimate business activities.

Under no circumstances may gifts or hospitality be offered or accepted where their nature, frequency or value could compromise the recipient's independence or create a reputational risk for the Group.

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Employees are expected to exercise sound judgement at all times and avoid situations that may create even the appearance of impropriety.

Failure to comply with these principles may result in disciplinary action.

COMMUNICATION AND PROFESSIONAL RELATIONSHIPS

Gourmet Catering & Eventos does not tolerate any behaviour that could lead to the isolation, exclusion or marginalisation of any employee.

The organisation actively promotes the integration of all employees throughout their professional careers, fostering a working environment in which interpersonal relationships, collaboration and open communication are encouraged and respected.

Professional relationships must therefore be conducted with respect, cooperation and courtesy, avoiding any behaviour that may directly or indirectly hinder the participation, expression or normal interaction of any employee within the workplace.

8. MONITORING AND ENFORCEMENT OF THE CODE OF ETHICS

This Code establishes monitoring and oversight mechanisms designed to ensure its effective implementation and compliance with the ethical principles and values it contains.

Professional activities may occasionally give rise to complex situations or uncertainty regarding the appropriate course of action.

For this reason, Gourmet Catering & Eventos promotes a corporate culture founded on responsibility, ethical behaviour and decision-making aligned with the Group's values.

Before making any decision, everyone subject to this Code should ask themselves the following questions:

- Is it lawful?
- Is it ethical?
- Is it consistent with the principles and values established in this Code?
- Would it be professionally and reputationally appropriate?
- Would I make the same decision if it were made public?
- Does it demonstrate respect for people, clients, business partners and society?

If the answer to any of these questions is "No", or if you are uncertain, you should stop and seek advice.

You may consult your line manager, the Human Resources Department or the relevant section of this Code.

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What does this Code mean for me?

We expect everyone to:

- behave ethically and take pride in their actions and decisions;
- comply with this Code and all applicable legal and regulatory obligations;
- understand the Group's Mission, Vision and Values and apply them in their daily work;
- report any unethical, unsafe or non-compliant behaviour through the appropriate internal reporting channels.

9. ACCEPTANCE AND COMPLIANCE

This Code is mandatory for all employees of Gourmet Catering & Eventos, including directors, managers and supervisors.

The Group shall communicate and publish this Code through its corporate website and ensure that it is made available to all employees, clients and suppliers.

Employees shall formally acknowledge their commitment to comply with this Code upon joining the organisation.

Gourmet Catering & Eventos expects the highest standards of commitment to the principles contained herein.

Compliance with this Code may be taken into consideration when evaluating employee performance.

Any breach shall be investigated in accordance with internal procedures, applicable legislation and collective agreements, and may result in disciplinary measures where appropriate.

Any questions concerning the interpretation or application of this Code should be referred to the Group's General Management.

No person, regardless of their position or level of authority, is authorised to request another employee to breach this Code.

No employee may justify improper conduct on the basis of instructions received from a superior or ignorance of the contents of this Code.

Any breach of this Code may seriously damage the reputation and integrity of Gourmet Catering & Eventos.

Accordingly, all directors, managers and employees have a duty to report any breach or suspected misconduct observed during the course of their professional activities.

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The Group has established a formal **Internal Reporting System (Whistleblowing Channel)**, enabling employees to raise concerns or report breaches of this Code in good faith and without fear of retaliation.

10. ETHICS COMMITTEE

The Ethics Committee is an advisory and consultative body responsible for:

- promoting awareness, understanding and compliance with this Code;
- interpreting the Code and providing guidance where uncertainties arise;
- supporting the resolution of ethical issues and conflicts relating to the application of this Code;
- managing confidential reporting channels available to employees, suppliers and business partners for reporting suspected breaches or seeking guidance.

The Ethics Committee consists of:

- **Maite Uclés** — Human Resources Director
- **Maite Bufo** — Occupational Health & Safety Manager

11. BREACHES OF THE CODE OF ETHICS

Compliance with this Code is mandatory for all employees of Gourmet Catering & Eventos.

Failure to comply with its provisions may constitute a serious disciplinary offence and may lead to disciplinary action, including dismissal where appropriate, always respecting the legal rights and procedural guarantees of the persons concerned and in accordance with applicable legislation.

12. ENTRY INTO FORCE

This Code shall enter into force on the date it is formally communicated to all employees and shall remain effective until amended or repealed.

Gourmet Catering & Eventos shall take all necessary measures to ensure that every member of the organisation—including General Management, directors, managers and all employees, regardless of their role, workplace or contractual arrangement—is aware of and complies with the provisions of this Code.

The Code shall be reviewed and updated periodically by the Ethics Committee, taking into consideration legislative developments, best practice and the suggestions and proposals submitted by employees.

