

Corporate Ethics Policy

Proceeding with integrity



Customer

Employee

Supplier

Society

Capital



1) THE CORPORATE ETHICS POLICY OF VIRTO GROUP

1.1. WHAT IS THE CORPORATE ETHICS POLICY OF VIRTO GROUP?

Corporate ethics are considered to be all the rules, values and ways of behaving that are reflected in the culture of a company.

These rules serve as a guide and a driving force for all people who work for the company and help the company to operate correctly, because they mean that we all have to conduct ourselves by bearing in mind the same considerations and under the same basic principles.

Our company, which has an international presence and vision, shares the principles of the United Nations Global Compact, supporting the protection of human rights at all times and also guaranteeing the effective recognition of collective bargaining through our continuous support for the elimination of forced labour, the eradication of child labour, the abolition of discrimination practices in employment and the workplace and the elimination of corruption in any of its forms.

1.2. WHO DOES THIS CORPORATE ETHICS POLICY APPLY TO?

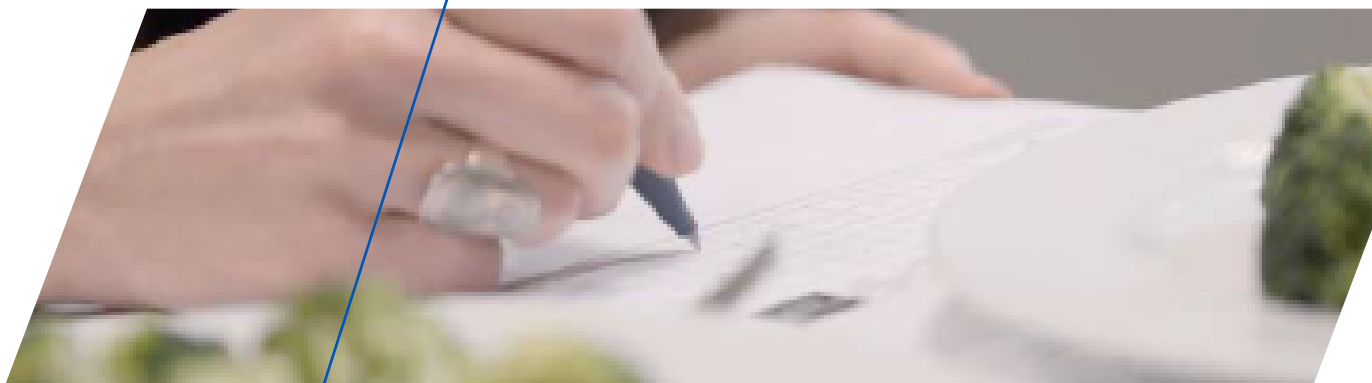
The Corporate Ethics Policy of Virto Group applies to all the companies that comprise it, and all the people that work there.

1.3. WHAT ARE THE REQUIREMENTS FOR THE VIRTO GROUP TEAM?

All of the Virto Group team must comply with the basic rules that make up the Corporate Ethics Policy. If any person in the team believes or has reason to believe that there has been improper conduct, it is important that they report this so that it can be dealt with and so that more serious incidents can be avoided. Employees can report improper conduct as follows:

- Suggestion box: this allows people to report incidents anonymously
- Direct department superiors
- Human Resources Department
- E-mail: info@virto.es
- Phone: 948 692 728

Additionally, every Virto's supplier and customer will have the possibility to communicate any unethical attitude that might occur with workers of the Group, through this phone number +34 948 692 728.



2) BASIC ETHICAL RULES

2.1. WHAT ARE BASIC ETHICAL RULES?

In our daily work, situations might arise that can cause a conflict in how people behave or conduct themselves. These basic rules help to guide the professional conduct of the whole Virto Group team.

We must remember that as the people that make up Virto Group, we are the best representatives of the company and we should know how to conduct ourselves at all times, working every day to achieve the standard of the Total Quality Model. Only in this way is it possible to standardise and put into practice the same corporate philosophy and culture in each and every one of the areas of the company.

RESPECT



In our daily professional relationships we should treat others as we would like to be treated.

COOPERATION



We should value teamwork above everything. All the people that comprise Virto Group are important and the achievement of the company's strategic objectives depends on our work. We should avoid confrontations or power struggles between people or departments, ensuring that we establish trusting relationships that place the common good of the company above personal issues.

NON-DISCRIMINATION



Both the hiring of new employees and the promotion of current ones will be governed exclusively by criteria of professional suitability, dedication, hard work, knowledge, experience and the ability to carry out the job. There will never be discrimination on the grounds of gender, race, age, beliefs, religion or any other individual or personal characteristic.

DIGNITY



Our behaviour should be based on mutual respect and always valuing each other as people, not humiliating or degrading others or allowing them to be humiliated or degraded.

OUR ETHICAL BEHAVIOUR

We support fundamental human rights.

We behave with integrity and responsibility.

We are committed to being socially responsible.

We protect the company's good name.

We treat people and the environment with respect.

We apply our ethical rules to the five components of the Total Quality Model.

The Virto Total Quality Model is a way of seeing the company as the same for all the people that comprise it, and its objective is to fulfil its five components: The Customer, the Employee, the Supplier, Society and Capital. These components need to be in balance and equally fulfilled.

The basic principles or rules that govern the Corporate Ethics Policy of Virto Group, and which we must apply to the five components of the company (the customer, the employee, the supplier, society and capital), are:

INTEGRITY AND HONESTY

Integrity means that we place these values above convenience or our own interest, doing the right thing at all times.

Honesty means that we must be truthful, sincere and honourable in all our communications so that we do not confuse or deceive others.

CONFIDENTIALITY

The disclosure to third parties of any information related to the procedures, methods, transactions or know-how of the company is prohibited.

RESPONSIBILITY

We should maintain an attitude of commitment to obligations, by fulfilling the work entrusted to us and taking responsibility for the consequences of our actions.

The company is committed, in its Corporate Social Responsibility (CSR) Plan, to prioritising sustainable development in the economic, social and environmental spheres.



2.2.CODES OF CONDUCT: THE APPLICATION OF ETHICAL RULES AND PROTECTION OF ASSETS

We should take responsibility for protecting and maintaining the assets and resources of the company that have been entrusted to us. These should be used exclusively for purposes that are related to the carrying out of our work. We should be careful with costs and organised in the workplace. It is prohibited to take any kind of material outside the company's premises without express authorisation, such as: work clothing, office supplies, tools, frozen products, etc. The environment and environmental resources should be respected in order to achieve sustainable development.

GIFTS, MEALS AND ENTERTAINMENT



Virto Group should not be influenced by receiving favours and should not attempt to inappropriately influence third parties by granting favours; gifts, meals, etc. If a third party intends to reward an employee (including tips), we should express gratitude for the gift but not accept it. If the giver insists, the gift should be surrendered to the company (no employee should be the individual recipient of any gift without reporting it). Only the gifts that the company itself gives to its employees can be accepted. All these gifts or presents will be used for social purposes.

CONFIDENTIAL INFORMATION



We understand confidential information to be any information that is not public knowledge or not public knowledge yet, included: strategic and commercial plans, market research and benchmarking, R&D and manufacturing proposals and results, designs, databases, records, information concerning salaries and any other financial information or any unpublished information of any other kind. Disclosing or distributing confidential information is prohibited. This obligation remains in force once the employment relationship has ended. If you send a confidential document or confidential information by mistake, you must notify the HR department as quickly as possible.

RELATIONS WITH THE MEDIA



No employee of Virto Group should provide information about the company to the media without the prior knowledge and authorisation of the Marketing and Communication department. Similarly, providing data for surveys or statistics of any kind via the telephone is prohibited. Any request should be forwarded to the Marketing and Communication department.

NON-COMPETITION



All of the people who work for Virto Group should treat any information about the company itself or about its clients or suppliers that is open to use by any competitor as confidential or reserved information. Similarly, at the end of the employment relationship, you must return to the company any document, set of documents or their copies that you may have had access to, whether in a physical or electronic format, with any right of retention concerning them being expressly excluded.

DECLARATION OF INTERESTS AND IMPARTIALITY



Every commercial relationship must be based in confidence. Interest conflicts generate risks and can make that confidence disappear. The wrong management of these personal conflicts could occur in negative consequences. When an interest conflict appears, it must be communicated as soon as possible.

MONEY LAUNDERING



Virto Group is committed to Money Laundering Prevention, and has an internal control procedure to prevent and act in case of possible illegal acts and/or suspect financial operations are detected.

Virto around the world

Headquarters



Quick-freezing
Centre



Packaging
Centre



Logistics Centre

1. Ultracongelados Virto
Azagra, Navarra - 1994

National Presence

International Presence



2. Ultracongelados de Cortes
Cortes, Navarra
1986



3. Ultracongelados Azarbe
El Raal, Murcia
1993



4. Ulbasa
La Albuera, Badajoz
1994



5. Ultracongelados del Oja
Santo Domingo
de la Calzada, La Rioja
1996



6. Ultracongelados del Duero
Sanchoño, Segovia
2000



7. Mallén Logistic Centre
Mallén, Zaragoza
2006



8. Ultracongelados Virto
Funes, Navarra
2010



**9. Ultracongelados Azarbe,
Santaomera Centre**
Santaomera, Murcia
2017



10. Vicampo
PAU, France
2003



14. Virto Frozen Foods
Peterborough, U.K.
2012



18. Virto USA
Jonesborough, TN - USA
2018



22. Oerlemans Foods
Warsaw,
Poland 2018



11. IFT, Gelcampo
Murtosa, Portugal
2005



15. Virto Deutschland
Langen, Germany
2013



19. Oerlemans Foods
Waalwijk,
The Netherlands
2013



12. Blencor
Sealy, Texas - USA
2010



**16. Gelcampo Alimentos
Brasil LTDA**
São Paulo, Brasil
2016



20. Oerlemans Foods
Strzelno,
Poland 2018



13. Virto France
Angers, France
2003



17. Virto Chile
Santiago de Chile, Chile
2016



21. Oerlemans Foods
Siemiatycze,
Poland 2018