

# COMPLIANCE POLICY

## Corporate Policy

### OBJECTIVE

Establish the guidelines to ensure compliance with current legislation applicable in the UK and the countries in which the company operates.

### PURPOSE

Promote a consistent, rigorous, and comprehensive approach to legal compliance at all levels, communicating and endorsing a proactive culture based on the principle of zero-tolerance for non-compliance.

### IMPLICATIONS

- Pantaleon Group business units must comply with all local laws and regulations in the UK, the countries in which we operate and other voluntarily adopted regulations or standards.
- Pantaleon Group business units must conduct business only with Third Parties who share our commitment to operate with high ethical standards, in accordance with all applicable laws and regulations, and in a responsible way.
- Pantaleon Group business units must create training and educational programs for employees to raise awareness of the legal and ethical implications of their actions and behaviors.
- Pantaleon Group business units must appropriate disciplinary actions in the event of a breach, or the failure to report a breach according to the Code of Ethics and Conduct.
- Pantaleon Group business units must develop and maintain a system to monitor legal and ethical compliance and continuous improvement of the Compliance Management System (CMS).
- Pantaleon Group business units must ensure that in all negotiations all terms are carefully reviewed and understood in all their legal scope, prior to being accepted and becoming mandatory and binding.
- Pantaleon Group business units must maintain confidential speak-up mechanisms through which anyone without fear of reprisal may file a complaint of known or suspected cases of bribery, corruption, fraud, other type of crime or noncompliance.
- The senior management in each business unit of Pantaleon Group must empower and recognize independence of the Office of Ethics and Compliance (OEC) to ensure the success of the Compliance Program.