

araven

GROUP

GENERAL POLICIES

*The Company · Code of Ethics ·
Integrated Management System · Quality Policy · Environmental Policy*

araven

GROUP

THE COMPANY



ARAVEN GROUP S.L. is the parent company of **ARAVEN S.L.U.** and **GRUPO OM COMUNICACIÓN VISUAL S.L.U.**, both of which were integrated in 2020 to ensure innovative, sustainable leadership of the retail and food service equipment sectors. **Henceforth, they came to form ARAVEN GROUP.**

ARAVEN GROUP specializes in **three different lines of business** for the hospitality and retail sectors:

- Solutions for professionals from the hospitality sector.
- Shopping carriers.
- Visual merchandising, visual communication and POS solutions.

ARAVEN GROUP S.L. was founded and started operating on November 30th 2016 with a clear vocation to become a keystone in the generation of value through business management of the trading companies ARAVEN S.L.U. and GRUPO OM COMUNICACIÓN VISUAL S.L.U. It currently has 4 employees and a head office in Madrid (Spain).

Araven S.L.U. was founded in Zaragoza in 1976. This international **company** specializes in the design, manufacture and sale of an innovative, comprehensive range of food storage and handling utensils for the **commercial catering and hospitality** sectors, and equipment for the **retail** sector. Our multidisciplinary creative team, made up of 59 members of staff, strives constantly to innovate, surprising our target markets with enticing solutions, always with the assurance of the superior quality synonymous with our products and customer service. Thanks to our in-depth international vision, backed up by **an extensive network of agents and distributors worldwide**, our products can be purchased in over 80 countries, and our standard services, management practices, key focuses, knowhow and training to boost our competitive capacity are all integrated in a value chain in the midst of a process of change.

Grupo OM Comunicación Visual S.L.U., founded in Madrid in 1982, **develops and creates tailor-made visual merchandising, visual communication and POS solutions** for the **retail** sector, providing value for clients in the creation, transformation and implementation of corporate ideas at sales points in order to help improve the shopping experience for consumers and position the client's brand and its products. The company currently has a workforce of 97 people and a **network of external workshops, equipped with the latest in printing and plastic and metal processing technology**. In this way, any project can be developed by the company, from its conception through to the final installation stage, controlling the different development and quality phases at all times.



ARAVEN is a company founded in the Aragon region of Spain in 1976 by two entrepreneurs with experience in the industrial plastic injection moulding sector and in marketing and sales. In 1977, they developed their first mould and, in 1978, they started to sell their products to major clients in Spain.

From that point on, ARAVEN began to grow, focusing on solutions for the home in the domestic market. In the late 1980s, it went on to penetrate the hospitality sector and, in the 1990s, to expand into the international market.

The company launched its first shopping basket in 1987 and, in 2005, a new line of business was developed specializing in retail equipment, with the launch of the Shop&Roll basket (the first shopping basket in the world with a telescopic handle and wheels). Shortly afterwards, it began to be manufactured in Mexico.

In the second decade of the 21st century, ARAVEN focused on developing these two business lines, with the launch of new shopping carrier solutions. It extended its range of Shop&Roll baskets and Loop shopping trolleys (the first compact trolleys in the world) and it created new food storage and handling utensils and equipment for the hospitality sector.

In 2017, the middle-market private equity group GED acquired a major shareholding in ARAVEN S.L.U. through ARAVEN GROUP S.L.

In 2018, ARAVEN's new premises in Villanueva de Gállego were inaugurated, covering a total of 7,800 square metres (with a 6,300 m² warehouse and 1,500m² of offices).

In 2020, ARAVEN further reinforced its leadership of the design and manufacture of shopping baskets and trolleys with a new line called Oceanis. This features Shop&Roll and Loop products made of recycled marine plastic from abandoned fishing rope and tackle.

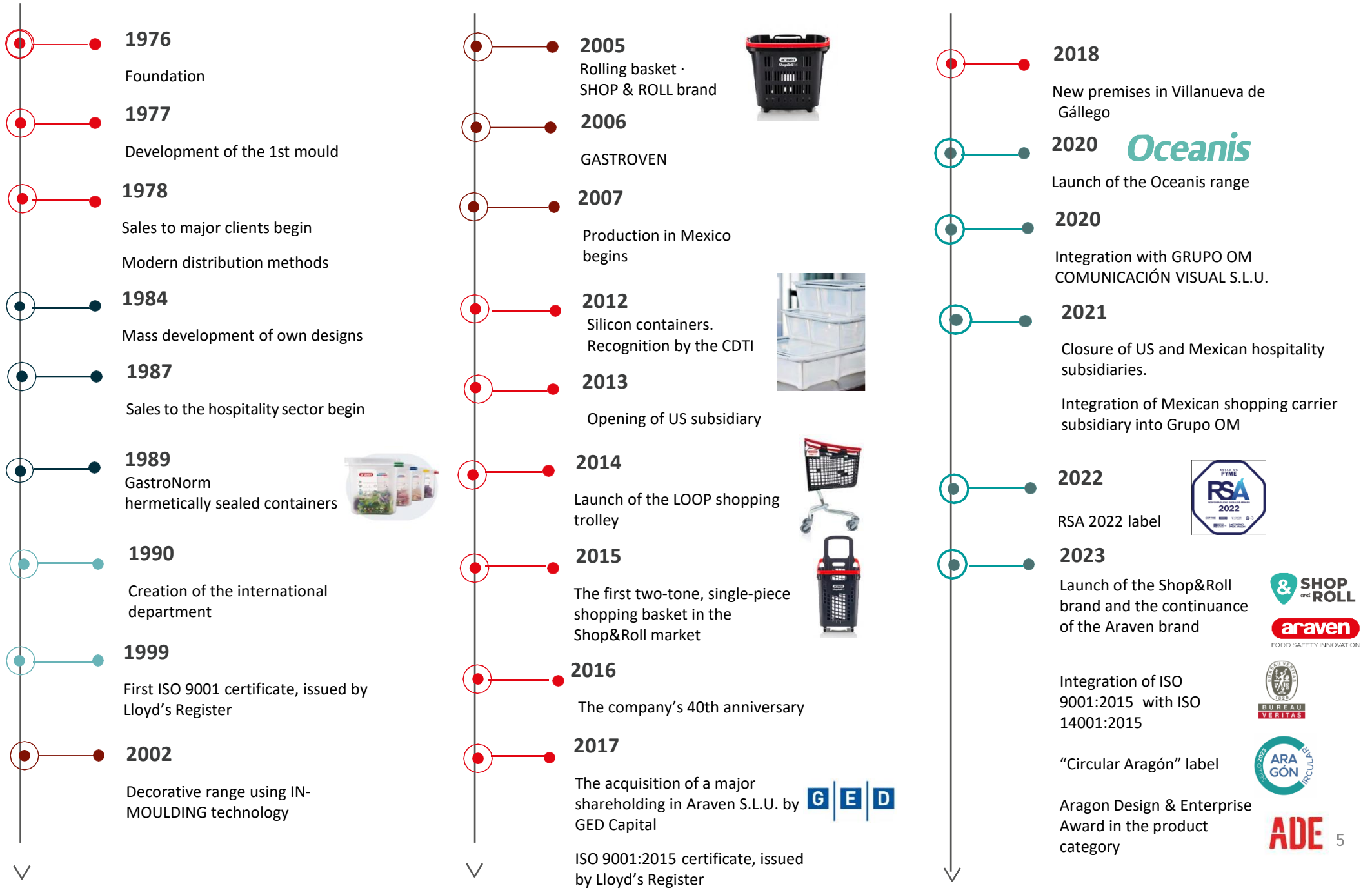
In the same year, ARAVEN was integrated with another company owned by GED Group, GRUPO OM COMUNICACIÓN VISUAL S.L.U., with the formation of a business group specializing in 3 lines of business for the hospitality and retail sectors. In the case of the retail sector, the group specializes in shopping carriers and visual communication tools.

In 2021, ARAVEN changed the subsidiary-based distribution model that it used for its business products for the US and Mexican hospitality sectors, managing them through a distributor. Its Mexican shopping carrier business line was integrated with that of GRUPO OM in Mexico and, as a result, the production and distribution of this range of products in Mexico came to be handled by GRUPO OM's Mexican division.

Thanks to the effort and dedication of all ARAVEN's workforce to incorporate a series of Sustainable Development Goals, in 2022, ARAVEN was awarded the "Aragon Corporate Responsibility" label.

In 2023, the Shop&Roll brand was launched as a unified sales brand for the retail sector. This encompasses all the retail solutions developed by ARAVEN and GRUPO OM: shopping carriers and visual communication, visual merchandising and POS solutions. Araven was maintained as a commercial brand for the hospitality sector.

In the same year, ARAVEN and GRUPO OM integrated their ISO 14001:2015 Environmental Management System with their ISO 9001: 2015 Quality Management System, achieving the renewal of their quality certificate. ARAVEN was also singled out twice by the Regional Government of Aragon. In early 2023, it was awarded the "Aragon Design & Enterprise Award" in the product category for its ColorClip line of hermetically sealed products, followed by the "Aragón Circular" label in recognition of the company's bid to apply circular economy principles to all its activities.





GRUPO OM COMUNICACIÓN VISUAL S.L.U. - OUR HISTORY

+40

YEARS



GRUPO OM, founded in 1982, is a leader in the development and production of innovative, all-round solutions aimed at facilitating and boosting promotional activities at sales points and improving the shopping experience. The company's client portfolio includes leading distributors for whom it works from the product conception phase through to the installation of the final product at the POS.

In November 2012, NAZCA Capital acquired all the share capital of Ovelar Merchandising S.L. in order to transform it into a multinational group for Spain and Mexico. With NAZCA's ownership of the company, Ovelar's name was changed to GRUPO OM and the goal was to boost its leadership of the Spanish and Mexican markets, where the company had a long history, and to boost its growth in Latin-America.

In 2013, GRUPO OM moved its head office to Rivas Vaciamadrid (Madrid), with premises covering a total area of 8,700 m² including offices, production facilities and a warehouse. It had a workforce of 135 people.

In 2015, a distribution agreement was signed in Spain with the multinational HL Display, with a view to innovating and introducing solutions to the Spanish market. This was later extended to Portugal, Morocco, Tunisia and Mexico.

From then on, computer tools were developed in order to optimize processes, and machinery was incorporated to develop the company's lines of business. In 2016, digital printing machinery was purchased and telephonic sales were introduced to meet client demands.

In 2019, GED Capital acquired all the share capital of NAZCA Capital in order to continue the process of GRUPO OM's professionalization. In March 2020, a business group was created together with ARAVEN S.L.U. to take advantage of synergies in clients and complementary products as a result of the integration of both companies, present in both Spain and Mexico. With their integration, the group came to specialize in 3 lines of business for the hospitality and retail sectors, in this last case specializing in shopping carrier solutions and visual communication tools.

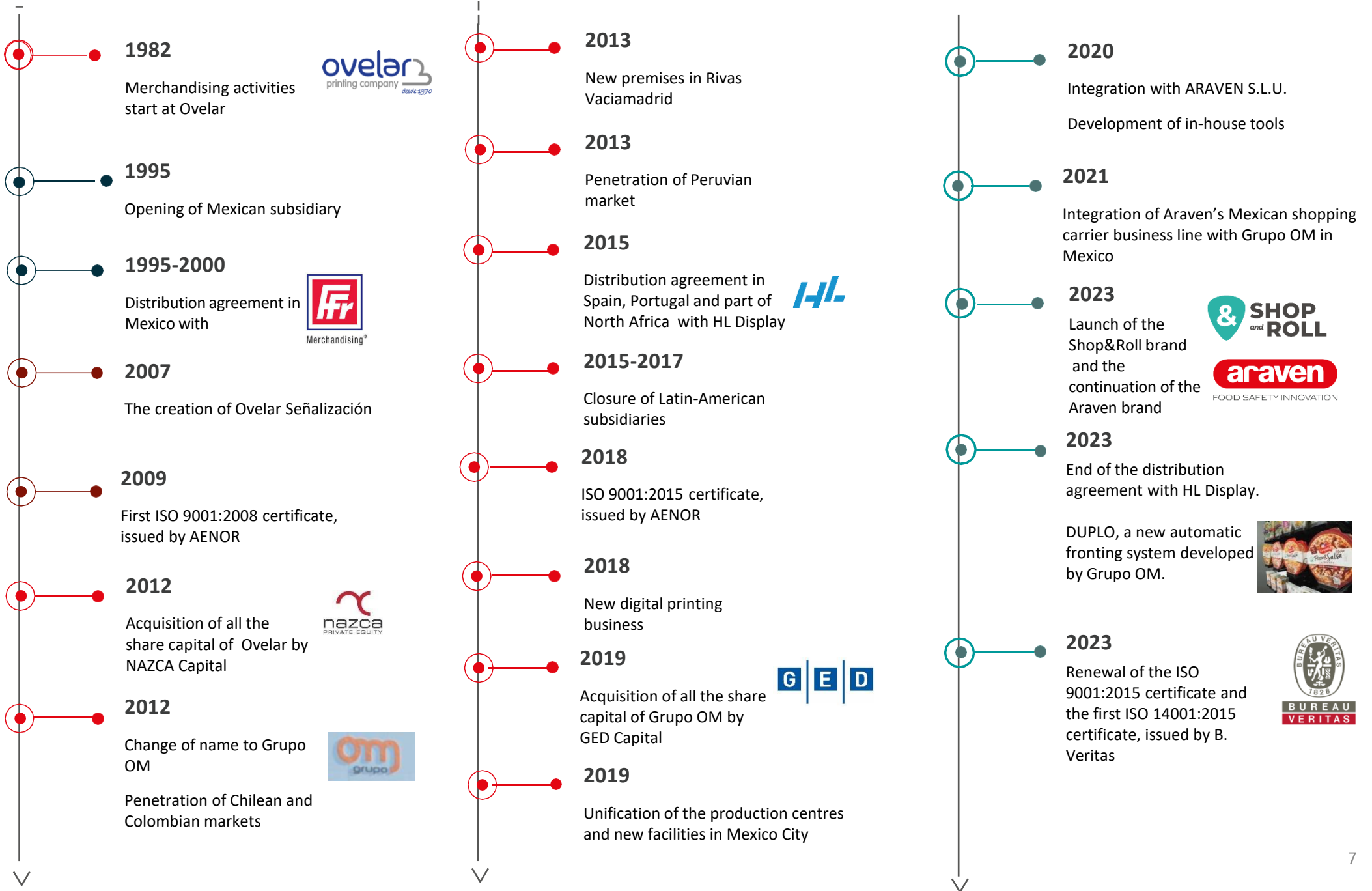
In 2021, ARAVEN's Mexican shopping carrier business line was integrated with that of GRUPO OM in Mexico. As a result, GRUPO OM's Mexican division became responsible for the production and distribution of the shopping carrier range in Mexico.

In 2023, the Shop&Roll brand was launched as a unified sales brand for the retail sector. The range included all the solutions that both ARAVEN and GRUPO OM had developed for the sector: shopping carrier products and visual communication, visual merchandising and POS solutions. Araven was maintained as a sales brand for the hospitality sector.

In the same year, the distribution agreement with HL Display came to an end and a range of pusher-system products for stores was launched, with the first DUPLO automatic fronting system. This was a CONVERTIBLE modular pusher system for optimum linear product management, developed and manufactured entirely by GRUPO OM.

Furthermore, in 2023, ARAVEN and GRUPO OM integrated their ISO 14001:2015 Environmental Management System with their ISO 9001:2015 Quality Management System, achieving the renewal of their quality certificate and their first environmental management certificate.

GRUPO OM COMUNICACIÓN VISUAL S.L.U. – OUR HISTORY



OUR MISSION, VISION AND VALUES



Mission

To offer our customers innovative Solutions in all the different business lines we are acting on, always bearing **sustainability** in our mind.



Vision

To lead the equipment in the different sectors we are **working on**, both in national and international markets.

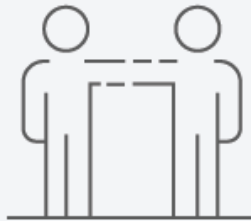


Values



CUSTOMER SERVICE

Our aim is always to satisfy our customers needs



COLLABORATION

We feel in plural. Our awareness goes beyond ourselves. We think as a team, as a territory, as a world



INTEGRATION SPIRIT

We transmit transparency in all our decisions, and create a sense of belonging



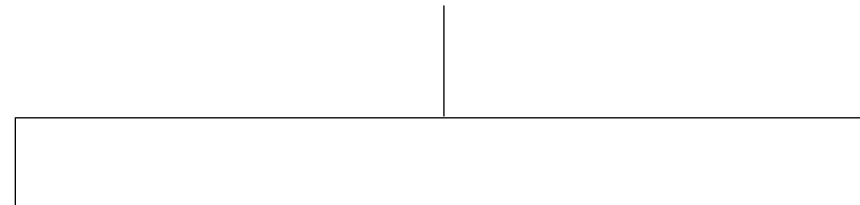
AMBITION FOR EXCELLENCE

We constantly improve ourselves to offer our best



INNOVATION

The unknown attracts and stimulate us to explore new possibilities and to draw the future



**Innovative, sustainable brands for triumphing in the hospitality
and retail sectors**



We equip professionals from the hospitality sector, bringing efficiency to kitchens.

Through ongoing innovations, Araven Food Service has forged a reputation as a leading brand in food safety for the hospitality sector.

We develop work tools and utensils that are versatile, and easy and convenient to use. They come with full hygiene and food safety guarantees, helping to comply with regulations while also facilitating everyday work in the kitchen.



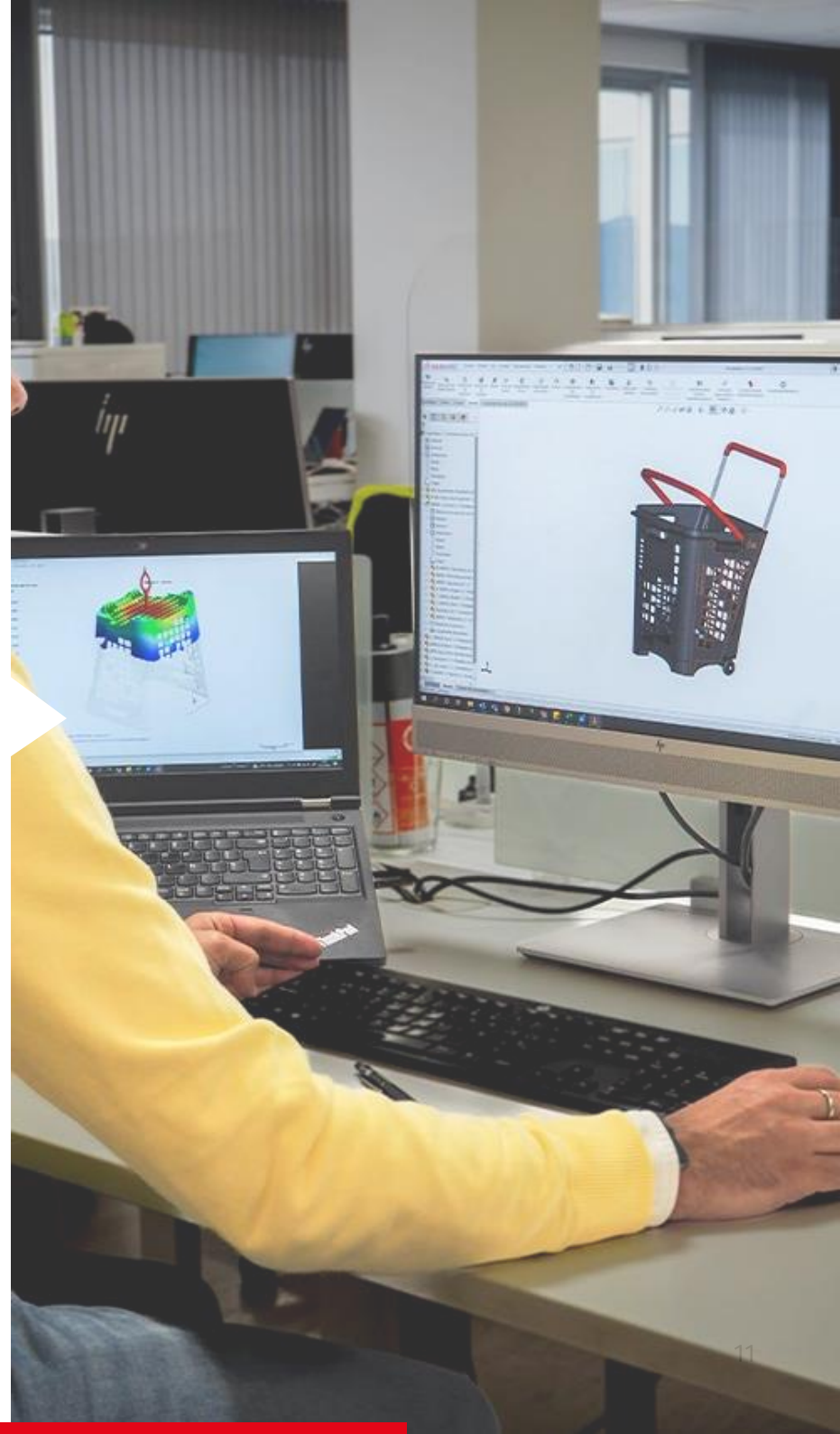
Shopping carrier and retail merchandising solutions for boosting brands at sales points.

Through atmospherics, organization, communication and shopping carrier solutions, we help clients create a brand identity, boost the visibility of products, and improve the shopping experience. Posters and signage, price signs, linear organizers, POS solutions, and shopping baskets and trolleys.

INNOVATION AS THE DRIVING FORCE BEHIND GROWTH

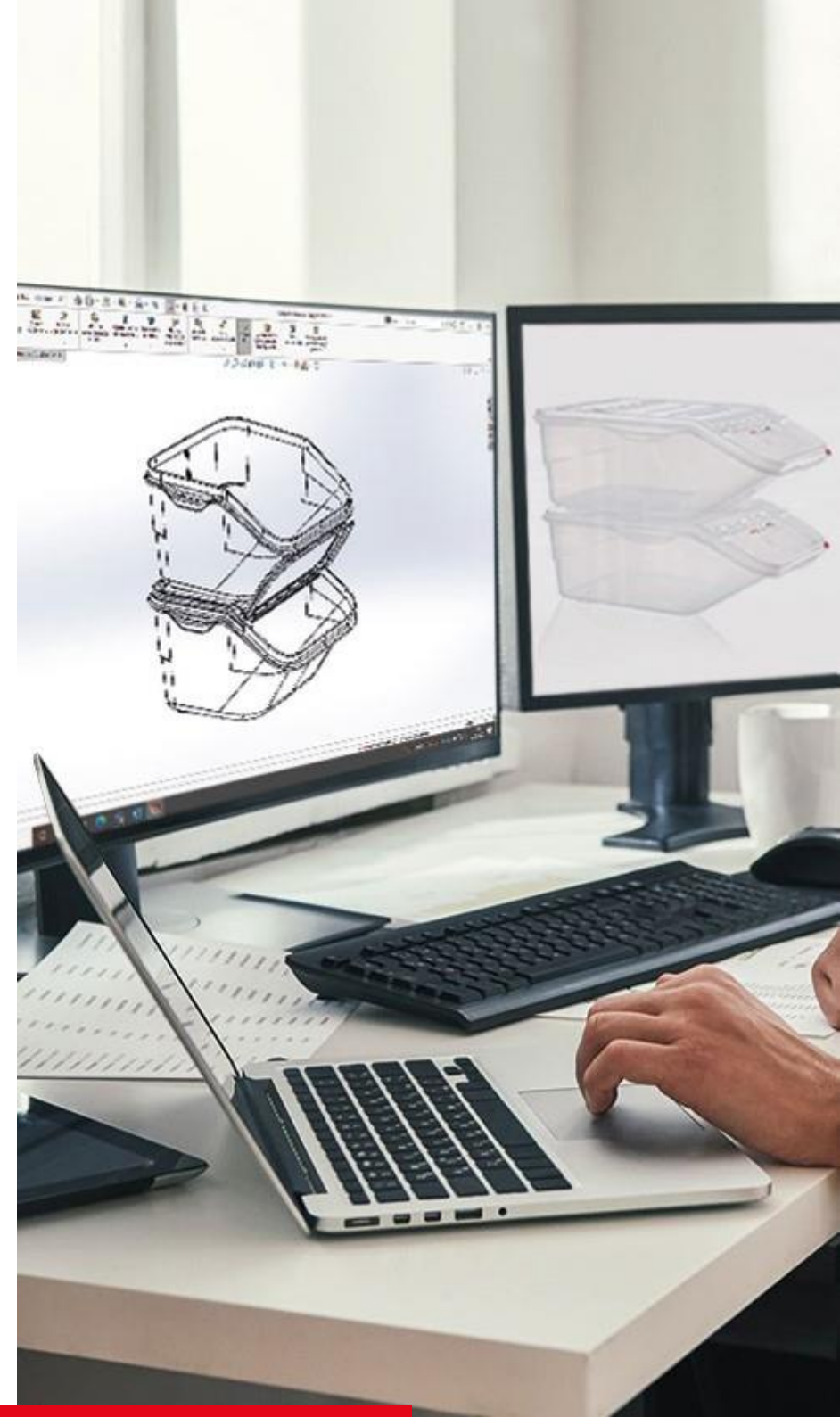
“Through **research and ongoing efforts**, we come up with ideas that are transformed into **new products and one-of-a-kind solutions in the different business areas** we specialize in. ”

A solid process of innovation, based on in-depth knowledge of the channels we work in. With the aid of collaborators, designers, and technology and market forecasting, combined with a high dose of creativity and the technical resources at our disposal, we come up with ideas that are turned into one-of-a-kind products with high added value.



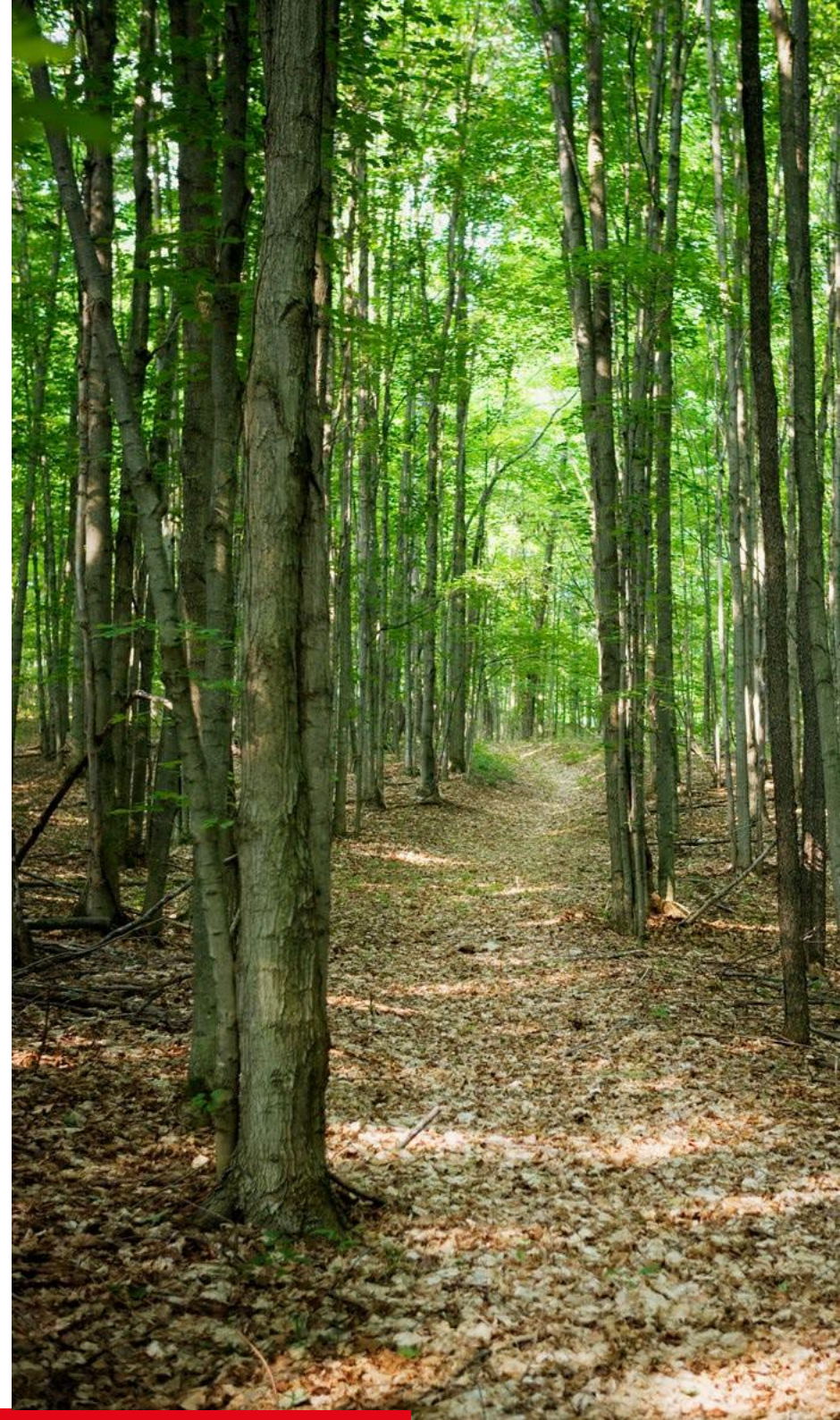
“When we work on **new solutions**, we always try to go **further than the existing ones**.”

In addition to their distinctive design, the solutions we develop also guarantee greater functionality in comparison with existing products, revolutionizing their corresponding markets.



Sustainability is no longer just a fad. It is a ***strategic priority*** and a reality for many companies. ””

At ARAVEN GROUP, our actions are based on the responsibility and commitment that society and the planet both require. We believe that society can only prosper if the planet is healthy. It is clear to us that today's environmental challenges cannot be tackled in isolation. They must go hand in hand with initiatives in the fields of economics and social development.



OUR GOALS AND OBJECTIVES ARE ALIGNED WITH SUSTAINABLE DEVELOPMENT GOALS

ARAVEN GROUP'S **strategic SDGs** are the ones we have the greatest capacity to influence and improve. We chose these particular goals and not others because they are the ones defined by our staff, our clients, our suppliers and all the stakeholders involved in our business activities.



Warehouses and sales offices in



+ 20

Distributors
throughout the world



+ 1,300

Attending to over
1300 clients

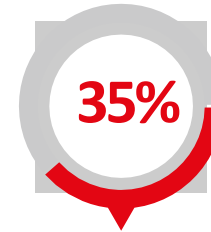


+ 1M€

Invested yearly in
R&D



Present in over 80 countries



DOMESTIC
SALES



EXPORT
MARKET



+ 300

Registrations and
patents

Turnover **+ 64M€**



Hospitality

18M€
(28%)



Shopping carrier solutions

22M€
(34%)



Visual Merchandising

24M€
(38%)

In our Zaragoza and/or Madrid facilities

CERTIFIED
ISO 9001



CERTIFIED
ISO 14001



Brands that confide in us



We count on the collaboration of the following bodies, among others



Universidad
Zaragoza



AIMPLAS
INSTITUTO TECNOLÓGICO
DEL PLÁSTICO



Instituto Universitario de Investigación
de Ingeniería de Aragón
Universidad Zaragoza



AECOC



ENRIQUE OLVERA



araven

GROUP

CODE OF ETHICS



PEOPLE

OUR PEOPLE

The development and creation of products for the hospitality, catering and retail sectors are an inherent part of ARAVEN GROUP, and yet behind its activities lies something even more important: **a team of specialist professionals, managers and creative staff, whose work revolves around the group's clients.** We research new designs and appealing products. We listen, provide guidance, and tailor our products and services to what users need. At ARAVEN GROUP, **we deal with products and we promote people, rejecting the use of child labour in any stage of the process and its interactions.**

Non-discrimination and equal opportunities

We promote the right to non-discrimination whatever a person's race, colour, nationality, social origin, age, sex, civil status, sexual orientation, ideology, political opinion, religion or other personal, physical or social condition, together with the right to equal opportunities.

In particular, we uphold equal treatment of men and women in access to employment, training, employment promotion, and working conditions.

We set in place preventive measures and we reject any expression of violence, harassment of a physical, sexual, psychological, moral or other kind, abuse of authority in the workplace, and any other type of conduct that creates an intimidating or offensive environment for the group's professionals.

Health and safety at work

We undertake to apply regulations and good practices in matters concerning working conditions and health and safety in the workplace.

All members of staff are responsible for strict compliance with occupational health and safety rules, and for safeguarding their own safety and that of anyone affected by their activities. It is forbidden to consume alcohol, drugs or any other substance that might affect due compliance with professional obligations.

Training

We programme training for our staff, fostering equal opportunities and the professional career development that will help to achieve corporate goals.

Selection and assessment processes

Our selection criteria are based on the academic, personal and professional merits of candidates and on our needs. We assess people, bearing in mind their professional performance at a joint and individual level.

Available resources and means for work activities

We undertake to ensure that our staff have the necessary, adequate resources and means at their disposal to carry out their work.

Without prejudice to compulsory compliance with specific rules and procedures regarding resources and means, ARAVEN GROUP's members undertake to use the resources and means at their disposal in a responsible way, solely using them for activities on behalf of the company and not for private purposes.

ARAVEN GROUP is the titleholder of the rights of use and the owner of the computer programmes and systems, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used by its staff within the framework of their work activities or ARAVEN GROUP's IT systems.

The computer equipment, systems and programmes that ARAVEN GROUP makes available to staff for the performance of their work, including access to and use of the Internet, must be used in accordance with the criteria of security and efficiency. Any IT-related use, act or function that is illegal or contrary to ARAVEN GROUP's rules or instructions is prohibited.

Confidentiality

Reserved or privileged information and the protection of personal data

At ARAVEN GROUP, we believe that the obtainment and proper use of information provide a competitive edge, and so information must be managed and handled in a responsible, secure, objective way in accordance with the law.

Handling reserved or confidential information

It is the duty of the people who form part of ARAVEN GROUP to protect information and knowledge generated within the organization, or owned or safeguarded by ARAVEN GROUP.

Staff shall refrain from using data, information or documents obtained during the course of their work for their own benefit. Neither shall they make information known to third parties, except in compliance with applicable legislation, company rules or when expressly authorized to do so. Neither shall they use data, information or documents of a confidential nature from a third company without its written authorization.

ARAVEN GROUP's members undertake to maintain the confidentiality of any data, information or documents obtained during the exercise of their responsibilities at the company and to use them in accordance with the company's corresponding internal rules. As a general rule, unless otherwise specified, the information to which they have access must be deemed to be confidential and it may only be used for the purpose for which it was obtained.

Likewise, they shall not make duplicates or copies or make any further use of the information than is necessary for the performance of their work, and they shall not store it in computer systems that do not belong to ARAVEN GROUP, with the exception of expressly authorized cases and purposes.

The confidentiality obligation shall continue once the activity has concluded, and it shall include the obligation to return any material related to the company that the employee might have in their possession when their relationship with the organization comes to an end.

Protection of personal data

ARAVEN GROUP's members must respect the privacy, at both a personal and family level, of all those people whose data they have access to, whether they are employees or not. Authorizations for the use of data must solely be given in response to specific, justified requests. Staff must strictly comply with the internal and external rules that have been established to safeguard the proper processing of any information and data supplied to the company by third parties.

When personal data is gathered from clients, staff, contractors or any other person or body with whom there is a relationship of a contractual or other nature, all staff must obtain their consent when this is compulsory and undertake to use the data in accordance with the purpose authorized by the consenting party.

Likewise, ARAVEN GROUP's members must be aware of and observe all internal procedures set in place regarding access to and the storage and custody of data, aimed at guaranteeing different required security levels, depending on the nature of the data.

The staff shall notify their superior of any detected incident concerning the confidentiality of information or the protection of personal data.

Confidential or privileged information includes but is not solely limited to:

- Accounting information and financial forecasts
- Mergers, acquisitions, associations, expansion plans and business plans
- Financing and securities operations
- Commercial and operational policies and practices
- Legal and administrative disputes
- Organizational changes
- The research and development of new products
- Personal information about the staff of ARAVEN GROUP
- Intellectual and industrial property, such as industrial secrets, trademarks, patents and copyrights
- Lists of clients and suppliers, and price structures and policies

Gifts and presents

ARAVEN GROUP's members may not give or accept gifts or presents during the course of their professional activities. Exceptionally, giving and accepting gifts and presents shall be permitted when the following circumstances all apply:

- They are of irrelevant or symbolic financial value;
- They are a common courtesy or common sign of commercial etiquette;
- They are not forbidden by law or in generally accepted commercial practices.

ARAVEN GROUP's staff may not—either directly or through an intermediary—offer, grant, request or accept unjustified advantages or benefits, directed at the obtainment of an immediate or mid-term benefit in the present or future, for ARAVEN GROUP, themselves or for a third party.

In particular, they may not give or receive any kind of bribe or commission from or through any other involved party, such as Spanish or foreign civil servants, staff from other companies, political parties, authorities, clients, suppliers and shareholders. Expressly forbidden acts of bribery include a direct or indirect offer or promise of any kind of undue advantage, any instrument for its concealment, and influence peddling.

Neither may money be received for personal use from clients or suppliers.

ARAVEN GROUP's members may not give or accept any hospitality that influences, might influence, or could be interpreted as influencing decision-making.

When there is any doubt about what is acceptable, the person's immediate superior must be consulted and they, in turn, may pass on the enquiry to the following management bodies: The General Management of Araven, S.L.U (Zaragoza) / The General Management of Grupo OM, S.L.U. (Madrid) / The Compliance Manager of ARAVEN GROUP.



Promotional materials such as pens, notebooks, mugs or magnets.
Gift baskets.
Cards or message of gratitude.
Small symbolic gifts of minor value, given on special dates such as a birthday, wedding, birth, graduation or retirement.



Gifts of money in cash or in an equivalent form, such as cheques or gift vouchers.
Costly luxury items.
Costly tickets to events.



Question: To celebrate the new year, one of ARAVEN GROUP's suppliers sent us a gift basket. It contains good quality items and I think it must have cost about €100.

We've done business with this supplier for the last few years. The basket is for all the staff of ARAVEN GROUP to enjoy.

Can we accept it?

Answer: It can be accepted with the prior authorization of your immediate superior. This kind of practice could be regarded as standard practice in business.

It is ARAVEN GROUP's policy for prior approval to be sought. Your superior is responsible for deciding whether the gift will compromise staff or appear to compromise them in future negotiations.

CONTEXT

BUSINESS CONDUCT

In business contexts, relations with different agents (governments and public authority bodies, clients, suppliers, the competition) can **stem from their interaction with ARAVEN GROUP as an authority, client, supplier, shareholder and/or salesperson.**

Compliance with legislation

It is ARAVEN GROUP's policy to comply and uphold compliance with laws, regulations and other applicable legal provisions.

Whatever the reason, ARAVEN GROUP's staff must not commit an unlawful or undue act or encourage or instruct a third party to do so.

As members of ARAVEN GROUP, staff must fulfil the following general responsibilities in matters concerning legal compliance:

- In the performance of their work, to conduct themselves in accordance with ARAVEN GROUP's underlying principles and values.
- To fulfil any obligations that must be complied with in their daily work.
- To undertake any responsibilities incumbent upon them in matters concerning legal compliance.
- To identify and make known any risks of non-compliance that they might encounter during the course of their professional activities.
- To make known, through ARAVEN GROUP's Whistleblowing/Queries Channel, any facts, circumstances and/or types of conduct that might constitute a dishonest or even criminal act detected at the organization.
- To participate actively in any established initiatives aimed at detecting, mitigating or reducing possible existing risks within the organization.
- To maintain open, fluid communication with the Compliance Manager, encouraging everyone else to do so.
- To cooperate with the Compliance Manager as a guarantor of compliance with legislation, encouraging everyone else to do so.
- To attend and take advantage of training, sessions, and other corporate events in this field, given or organized by the Compliance Manager.
- To adhere to ARAVEN GROUP's existing policies and to undertake to comply with anything derived from them, in particular, the hazard prevention systems set in place.

If a member of staff of ARAVEN GROUP is doubtful about the legality of a practice or has any uncertainty with regard to a law, regulation or standard, they must consult their immediate superior, who may pass on the enquiry to the following management bodies: the General Management of Araven S.L.U. (Zaragoza) / the General Management of Grupo OM S.L.U. (Madrid) / the Compliance Manager of ARAVEN GROUP.

Prevention of smuggling

ARAVEN GROUP promotes the transparent management of all its logistics activities, working with its haulage suppliers to ensure compliance with current legislation governing the movement of sales products.

Money laundering and funding terrorism

Money laundering is understood to mean any activity that seeks to conceal resources of criminal origins; the use of legitimate resources to support criminal activities; and prejudicing, obstructing or concealing information in the context of a criminal investigation into the aforementioned activities.

Funding terrorism is understood to mean the supply, deposit, distribution or collection of funds or goods, through any means, whether directly or indirectly, in order to use them or in the knowledge that they will be used, wholly or in part, for any crime of terrorism contemplated under international law.

As indicated in the ***Policy on Money Laundering and the Funding of Terrorism***, documented in the current version of the ***BASIC COMPLIANCE MANUAL***, in order to prevent money laundering and the funding of terrorism, ARAVEN GROUP's members must follow the following guidelines:



Furthermore, all affected persons must inform their immediate superior of any act suspected as being related to money laundering or the funding of terrorism, or which fails to observe either of the above principles. Their superior may refer the matter to the General Management of Araven, S.L.U (Zaragoza) / the General Management of Grupo OM, S.L.U. (Madrid) / the Compliance Manager of ARAVEN GROUP.

- Client identities must be checked, ensuring adequate knowledge of them in compliance with the rules of the Manual on the Prevention of Money Laundering and the Funding of Terrorism.
- When transactions are carried out on behalf of a client, documents must be requested confirming the powers granted to the representative.
- It is forbidden to make or accept extraordinary payments not specified in a contract or beyond its scope, or to bank accounts not envisaged in it.
- Checks must be made of unusual payment methods, bearing in mind the nature of the transaction, particularly payments or receipts of a high amount of money in cash or by cheque to the bearer.
- It is forbidden to make or accept payments when the origin or destination of the funds is unknown, or the final beneficiary is not clearly identified.
- Checks must be made of transactions involving unusual settlement methods or people or bodies other than the usual ones.
- Special attention must be paid to payments and collections to/from tax havens.
- Special attention must be paid to payments to people who carry out or have carried out important public functions.
- It is important to confirm that the instructions for all third-party payments and collections of money are in order and, in particular, that all the above checks have been made.

CONTEXT

CLIENTS

ARAVEN GROUP is a company with strong international links. **We seek to achieve client satisfaction at all times through excellence in innovation, quality, prices, and design appeal;** the premises on which our day-to-day work is based.

Client relations

Client relations must be conducted in accordance with the legislation in force. As a result, if it is found that a client is involved in illegal or unethical acts, this will automatically lead to the termination of our relations with them.

We must treat all our clients in a fair, proper way and in compliance with all applicable legislation governing free competition. We must not take undue advantage of our market position with any of our products or services. There must be a legitimate business reason for the sale of the same product at different prices to clients in similar locations, such as a difference in cost or participation in a bid for tenders.

Attempts must be made to avoid relations of exclusivity with clients that might lead to unwarranted personal ties or that might restrict client access to other members of the organization or other corporate channels.

ARAVEN GROUP's members must inform clients of any relationship of a financial nature or other kind that might represent a conflict of interests with them, taking the necessary steps to prevent it from interfering with the client's relationship with the organization.

Commitments and promises

Our commitments to clients, whether they are verbally made or written, must only include what we are logically able to fulfil. Notwithstanding this, it might be impossible, in unforeseen circumstances, to undertake a commitment. In such cases, your immediate superior and the client must be informed.

Transparency and integrity in communications

The sales promotions and sales arguments used by ARAVEN GROUP do not contain false information about the availability, delivery dates, quality of our products and services, or sales terms, including payment. Products and services must be offered in an accurate, honest way. Our aim is to provide clients with full, transparent, understandable, accurate information so that they can take independent decisions, aware of the interests at stake, the alternatives and relevant consequences. Using deceitful or dishonest practices is an infringement of our Code of Ethics and it will not be tolerated.

It is forbidden for ARAVEN GROUP's members to receive any kind of remuneration or funds from clients, and, in general, to accept any kind of third-party remuneration for services pertaining to the employee's work activities.



Due to the international scope of our activities, we are in contact with different cultures and, when we reach agreements, we strive to ensure compliance with the laws of the different countries where we operate.

If you negotiate on behalf of the company, you must report any relevant information on intended or real unfair trading practices by third parties.

CONTEXT

SUPPLIERS

Relationships of **trust with suppliers**, to the **mutual benefit of both**, have contributed to the success of ARAVEN GROUP. As a result, **we seek to ensure that our relations with suppliers are always based on transparency so that they are assured equal opportunities, respect and integrity.**



Due to the international scope of our activities, we are in contact with different cultures and, when we reach agreements, we strive to ensure compliance with the laws of the different countries where we operate.

If you negotiate on behalf of the company, you must report any relevant information on intended or real unfair trading practices by third parties.

Selection of suppliers

Supplier selection processes are based on a search for the highest benefit in quality and competitiveness for ARAVEN GROUP, without this impacting on objectivity and impartiality, avoiding any conflict of interest or favouritism in their selection.

In selection processes, any department or section of ARAVEN GROUP in need of a new supplier must bear in mind the minimum requirements established in the document "ARAVEN – GRUPO OM General Characteristics for the Selection of New Suppliers", available on the company's Intranet site.

In addition, commitments in the field of CSR must be taken into account, with special emphasis on the environmental commitment that ARAVEN GROUP requires of its suppliers and the acceptance of our Compliance Manual.

Relations with suppliers

ARAVEN GROUP promotes compliance with the stipulations of this Code of Ethics by its suppliers, and it urges them to carry out their activities within the framework of the legislation in force.

All suppliers working for ARAVEN GROUP must undertake to respect the human and employment rights of all hired staff. Under no circumstances shall the infringement of these rights be deemed acceptable by ARAVEN GROUP.

Commitments

One of ARAVEN GROUP's underlying principles is observance of the agreements and commitments undertaken in its contractual agreements.

We also respect intellectual and industrial property rights, and so staff may not enter into commercial relations with contractors or suppliers who fail to demonstrate that they are duly authorized to use or commercialize products and services subject to the payment of third-party intellectual or industrial property rights or who fail to demonstrate the authenticity or legality of the said authorizations. In such an event, the maintenance of commercial relations with the said supplier shall be forbidden.

Transparency and integrity in communications

As a general rule, ARAVEN GROUP's members are not allowed to accept or request any gift, present or offering, or any benefit to their wealth of any kind. They shall be subject to the rules concerning presents and gifts.

It is forbidden for ARAVEN GROUP's members to receive or accept any kind of remuneration or funds from suppliers or, in general, to accept any kind of third-party remuneration for services pertaining to the staff's work activities.

CONTEXT

COMPETITORS

ARAVEN GROUP exports its products to many countries with differing legislation and regulations on free competition. For this reason, ARAVEN GROUP's members must **ensure that all the company's activities are carried out in compliance with local legislation and regulations and the company's own policies.**

Sales or market information

Searches for sales or market information by ARAVEN GROUP's members shall always be conducted without infringing any rules that might protect this information.

ARAVEN GROUP's members shall refuse to accept information about competitors that has been obtained in an undue manner or by infringing the confidentiality under which it is maintained by its legitimate owners.

ARAVEN GROUP's members shall also avoid the dissemination of malicious or false information about the company's competitors in general.

Agreements with competitors that unlawfully restrict free trade shall not be permitted. Examples of these illegal practices, which are therefore prohibited, include price agreements, boycotts of groups, and retail manipulation.

ARAVEN GROUP's members have a duty to inform the General Management of Araven, S.L.U (Zaragoza) / the General Management of Grupo OM, S.L.U. (Madrid) / the Compliance Manager of ARAVEN GROUP of any potential agreement that might contravene this code.

MANAGEMENT OF THE CODE OF ETHICS

In order to promote the application of ARAVEN GROUP's Code of Ethics and to establish the procedure for the settlement of ethical conflicts, this section outlines the mechanisms for the said Code of Ethics.

Communication channel for queries, suggestions and whistleblowing

ARAVEN GROUP invites all its staff to report suspected infringements of this Code of Ethics. The company shall investigate any reported information in depth and it will not tolerate reprisals for having reported facts in all good faith. All ARAVEN GROUP's workers must cooperate in internal investigations relating to ethical matters. The information that is provided concerning reported cases shall be dealt with professionally and in confidence.

We believe that it is vital to create open communication channels to deal with situations or concerns brought up by our staff, without any fear of negative repercussions, in order to ensure the proper implementation of our Code of Ethics.

The communication channels that can be used to make suggestions, to relay exemplary cases in the promotion of values, to bring up queries of a legal and/or ethical nature, or to report undue conduct within the organization are:

- The Whistleblowing/Queries Channel
- The Compliance Manager of ARAVEN GROUP
- The worker's immediate superior
- The Human Resources Department

Disciplinary system

ARAVEN GROUP's members must comply with the principles of our Code of Ethics. Failure to comply with its stipulations shall be deemed to be a case of misconduct, and the person might become subject to disciplinary action.

Disciplinary action may range from a warning to dismissal, without prejudice to any action, obligation or sanction derived from the legislation in force.

()For further information, see the current version of the BASIC COMPLIANCE MANUAL, section 7.- DISCIPLINARY SYSTEM*

Management structure of ARAVEN's Code of Ethics

Management of the Code of Ethics is incumbent upon:

- The General Management of Araven, S.L.U (Zaragoza) / The General Management of Grupo OM, S.L.U. (Madrid)
- The Compliance Manager of ARAVEN GROUP
- The staff in charge of the Integrated Management System

They shall be responsible for:

- Promoting the values and conduct fostered in our Code of Ethics.
- Acting as a consultative body.
- Approving corrective steps aimed at guaranteeing consistency.
- Dealing with staff requests
- Investigating and documenting cases
- Updating and amending the Code of Ethics

All ARAVEN GROUP's members of staff share the principles put into practice at our organization and we hereby express our responsibility to comply with and promote them.

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INTEGRATED MANAGEMENT SYSTEM



Quality Management System



Environmental Management System

ARAVEN S.L.U.

“DESIGN, DEVELOPMENT, PRODUCTION MANAGEMENT AND MARKETING OF PLASTIC PRODUCTS FOR FOOD PRESERVATION AND HANDLING IN THE HOSPITALITY SECTOR AND FOR SHOPPING EQUIPMENT IN THE RETAIL SECTOR”

Applicability: ARAVEN applies all of the requirements of the ISO 9001:2015 and ISO 14001:2015 standards in relation to the aforementioned scope.

GRUPO OM COMUNICACIÓN VISUAL S.L.U.

“PRODUCTION OF SOLUTIONS FOR VISUAL COMMUNICATION AND MERCHANDISING FOR POINT OF SALE”

Applicability: OM GROUP excludes requirement 8.3 of the ISO 9001:2015 standard. It is justified that GRUPO OM excludes this point of the rule of reference of its quality system as the pictures, images are supplied by the client and the action which carries out by the Grupo OM's staff are only tiny modifications with the aim of the image's quality does not affect adversely in the moment of being depicted on the support.

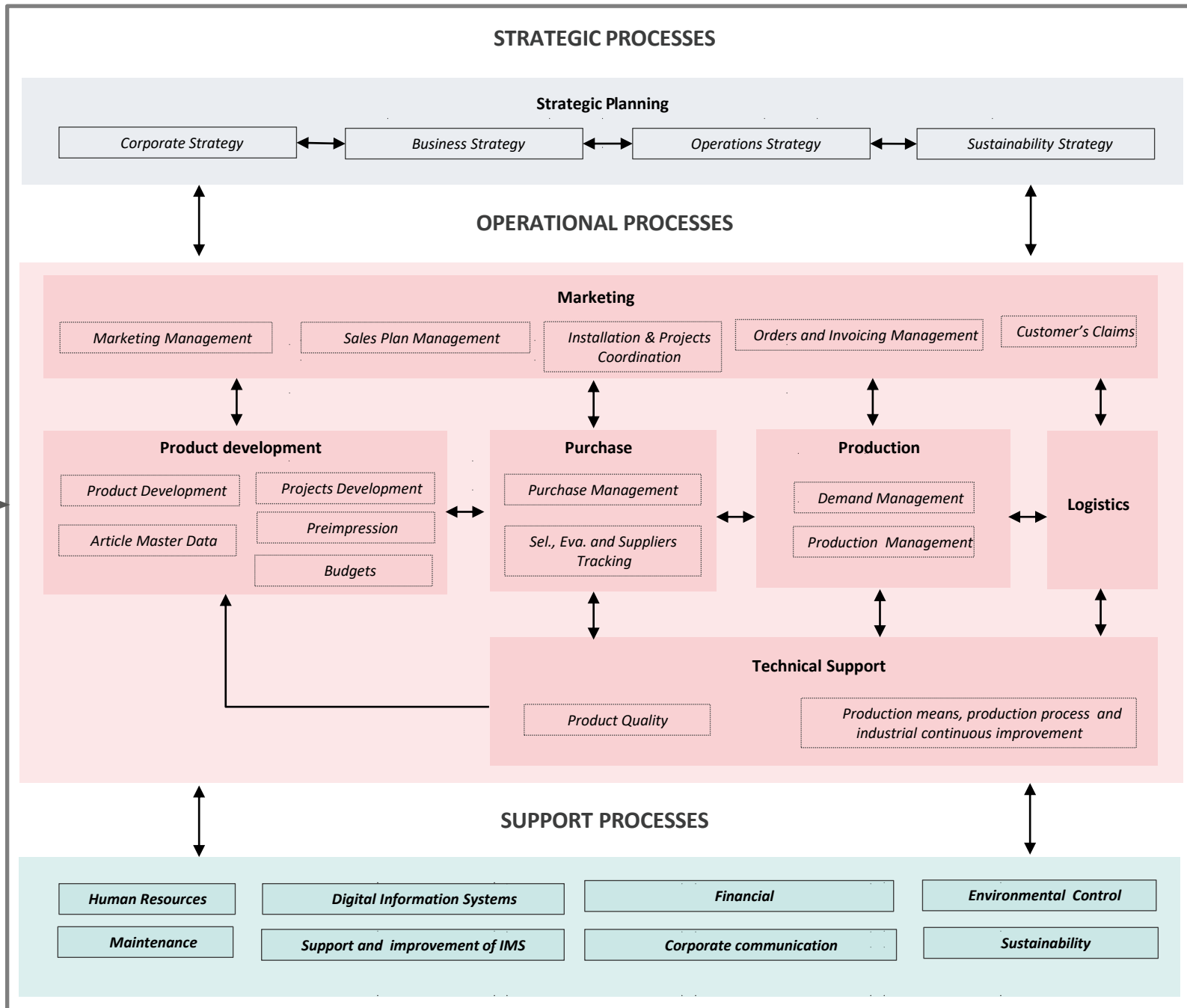
GRUPO OM applies all of the requirements of the ISO 14001:2015 standards in relation to the scope above stated.

ARAVEN GROUP manages by processes, a methodology that has been promoted from the conviction of managing all the performed activities, their interactions and compliance aligned with standards of recognized prestige implemented in the company such as ISO 9001:2015 and ISO 14001:2015.

The processes that ARAVEN S.L.U. and GRUPO OM COMUNICACIÓN VISUAL S.L.U. have organized through its Integrated Management System and the sequence of these processes is presented below.

Namely:

- **Strategic processes**, which establish leadership and basic decision-making for the organization's aims.
- **Operational processes**, which are directly linked to the manufacture of the product and/or providing services, from the initial contact with customers or the design of the product to final delivery.
- **Support processes**, that are necessary for the main activity to be carried out efficiently, providing resources or support for the operational processes. Their results are often inputs to other processes.



All of these processes are defined in terms of their scope, metrics, control points and objectives to fulfil and they are documented to the extent that is considered necessary.

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QUALITY POLICY

ARAVEN S.L.U. and GRUPO OM S.L.U. have a **mission to offer their customers innovative solutions** in the different lines of business in which they operate, always keeping **sustainability** in mind.

Our **vision** is to **lead the equipment in the sectors in which we work**, both nationally and internationally, with innovation as a fundamental pillar of growth.

Our strategy is based on our **Quality Policy**, the main goal is to achieve our vision, **meeting the expectations of our customers** and searching for solutions for all **interested parties** in our organisation.

To achieve this, we are focused on the **analysis of the context** and on the **needs of the interested parties** who help us to determine our annual goals. From there, we manage **risks and opportunities** by acting proactively and work to **address changes** in order to face them with flexibility and confidence.

We **focus on processes** and **continuous improvement**, which allows us to increase the efficiency of the Management System and the quality of our products and services, establishing the necessary controls both in the inputs and in the process itself and its outputs. **We determine and review goals** for each area, taking this policy as a frame of reference, setting responsibilities, establishing the criteria for action and allocating the necessary resources, in order to achieve them.

We are aware of the importance of the **customer's voice** and are specifically committed to identifying, understanding and complying with the customer's requirements and applicable legal and regulatory requirements. Identifying and considering the risks and opportunities that may affect the conformity of products and services and the ability to increase and maintain focus on customer satisfaction.

Finally, we are committed **to regularly reviewing this quality policy**, communicating it to the entire organisation and to our interested parties, ensuring its compliance and keeping it up to date at all levels, regularly monitoring its effectiveness and compliance.



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ENVIRONMENTAL POLICY

At ARAVEN S.L.U. and GRUPO OM S.L.U., companies dedicated to the **development, production and marketing** of products for the preservation and handling of foods **in the foodservice and commercial catering sector** and of products for shopping equipment and for visual communication and merchandising at the point of sale **in the retail sector**, we are aware of the importance of **sustainable development**, minimizing the environmental impact associated with our activity.

Within this framework, all members of the organization are involved, and our fundamental principles are:

- Complying with the **requirements** established in each of the works we perform, including those of a legal and regulatory nature, coordinating them with those of our Customers and Suppliers.
- Committing ourselves to **preventing pollution and the impact on the environment**, properly managing the environmental aspects derived from our processes and activities.
- **Minimizing** our consumption in processes, the generation of emissions and waste for their management and recycling.
- Promoting our environmental commitment to our **suppliers and customers** in order to involve them in it.
- **Continuously improving the performance** of our activities for a lower impact on the environment.
- **Integrating environmental management** into our daily operations, ensuring that environmental issues are addressed, while providing quality products and services to our customers.
- Proactively involving **all staff** in complying with the above points and in managing the environmental value of activities, making them aware of good environmental and social practices.

Compliance with this Environmental Policy is everyone's responsibility, it has the full support of the General Management, and its satisfactory fulfilment is deemed a priority goal.



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