FOOD SAFETY INNOVATION

DESIGNING **VALUE.**
DELIVERING **SUCCESS.**

GENERAL POLICIES

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Approved by Christophe Bergamo (CEO)

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01.

About Araven

1.1 Our Company

Araven S.L.U. was founded in Zaragoza in 1976. This **international company** specializes in the design, development, production management and marketing of an innovative, comprehensive range of products for food preservation and handling, serving and display, catering transport and cleaning for the **hospitality** sector.

From our headquarters in Zaragoza (Spain), our creative and multidisciplinary team constantly strives to innovate every day to surprise consumers with attractive solutions that not only offer distinctive design but also improve the functionality of existing solutions and revolutionize and revitalize the market.

Our values and unwavering commitment have enabled us to achieve a leading position in the market and in July 2024, the U.S. company **CFS BRANDS acquired our company** with its complete portfolio of unique solutions for the different needs of preservation, handling, service, display and cleaning in hospitality industry and will operate as an independent entity within CFS Brands.

CFS Brands has its headquarts in Oklahoma City (Oklahoma, USA) and operates 14 brands specialized in the manufacture of products for foodservice, healthcare and cleaning sectors.

ARAVEN S.L.U. is located in the **San Miguel Industrial Park, at C/ Río Martín nº 6 · Postal Code: 50830 in Villanueva de Gállego, Zaragoza (Spain),** where it has office facilities and a logistics and distribution warehouse for carrying out its activities.

ARAVEN S.L.U. operates under the brand name araven FOOD SAFETY INNOVATION

1.2 Our History

50
YEARS
(2026)

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 m^2 warehouse and 1,500m^2 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, ARAVEN GROUP SL, 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.

1.2 Our History

50 YEARS (2026)

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, ARAVAN was awarded the first "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.

In 2024, a new company called Sociedad Shop and Roll España, S.L. is stablished. This company has been part of the Araven Group since June 1, thus separating shopping carts and baskets division from Hospitality division, which continues under the Araven S.L.U. company.

In July 2024, U.S. company **CFS BRANDS acquires ARAVEN S.L.U.** with its complete portfolio of unique solutions for the different needs of preservation, handling, service, display and cleaning in hospitality industry and will operate as an independent entity within CFS Brands.

In **2026, ARAVEN celebrates 50 years** serving the professional foodservice industry. What began as a commitment to functionality, organization and food preservation has evolved over time, establishing ARAVEN as a specialized brand offering practical solutions for the professional hospitality sector, now present in kitchens around the world.
Also in 2026, as part of CFS Brands, ARAVEN consolidates its position not only as a brand**,** but also as **a company that begins manufacturing food preservation products for other brands within the CFS Group, while also taking responsibility for the distribution of the CFS Group's brands.**
Another important milestone is the recertification of ARAVEN's Quality Management System under ISO 9001:2015 and the achievement of its first ISO 14001:2015 certification.

1.3 ARAVEN through the years

1976 - 1977

Foundation and Development of the 1st mould

1978

Sales to major clients begin
Modern distribution methods

1987

Sales to the hospitality sector begin

1989

GastroNorm hermetically sealed containers

1990

Creation of the international department

1999

First ISO 9001 certificate, issued by Lloyd's Register

2002

Decorative range using IN-MOULDING technology

2005

Rolling basket · SHOP & ROLL brand

2007

Production in Mexico begins

2012

Silicon containers.
Recognition by the CDTI

2013

Opening of US subsidiary

2014 - 2015

Launch of the LOOP shopping cart and Single-piece shopping basket

2016

The company's 40th anniversary

2017

The acquisition of a major shareholding in Araven S.L.U. by GED Capital

ISO 9001:2015 certificate, issued by Lloyd's Register

2018

New premises in Villanueva de Gállego

2020

Launch of the Oceanis range

Integration with GRUPO OM COMUNICACIÓN VISUAL S.L.U.

2021

Closure of US and Mexican hospitality subsidiaries.

2022

Firts RSA 2022 label

EcoVadis Silver Medal

2023

Launch of the Shop&Roll brand and the continuance of the Araven brand

Integration of ISO 9001:2015 with ISO 14001:2015

Circular Aragón label

2024

New company Shop & Roll España for trolleys and baskets and continuity company Araven for hospitality.

Acquisition of Araven S.L.U. by CFS BRANDS

2025

"Since 2025, ARAVEN, S.L.U. has been committed to the corporate responsibility initiative of the United Nations Global Compact and its principles in the areas of human rights, labor, environment and anti-corruption."

2026

1976 – 2026

50 Anniversary

Manufacturing of containers for Carlise and distribution of products from other brands within the CFS GROUP.

ISO 9001:2015 Recertification and First ISO 14001:2015 Certification

CERTIFIED
ISO 9001
ISO 14001

ARAVEN S.L.U. is certified under a quality and environmental management system by Bureau Veritas against ISO 9001:2015 and ISO 14001:2015.

1.4 Mission, Vision, Values

Based on the **Mission, Vision and Values** of the **CFS BRANDS GROUP**, as members of the Group we present ours below:

Mission

To offer our customers innovative solutions in all the different sectors 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 stimulates us to explore news possibilities and to drow the future.

1.5 Our Brand

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

Through ongoing innovations Araven Food Safety Innovation (https:/araven.com) 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.

1.6 Lines of development

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 our business area** we specialize in.*

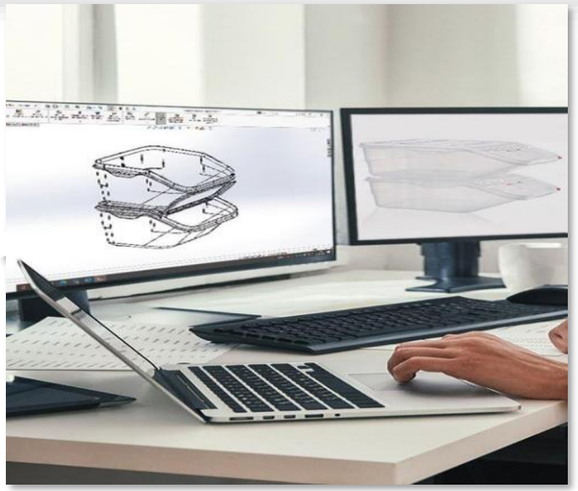
A solid process of innovation, based on in-depth knowledge of the channel we work in.

We consider innovation a driver of growth, aligned with one of our priority SDGs:
9 Industry, Innovation, and Infrastructure. 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.

DESIGN AND FUNCTIONALITY

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

These are proposals that not only provide a distinctive design but also improve the functionality of existing solutions and revolutionise and revitalise the market.



1.7 Our Products and Services

What are the benefits of our products for professionals at each phase of food management?

ARAVEN focuses all of its efforts on innovating in food preservation and handling processes, which are the most demanding areas in compliance with food safety regulations.

Storage and preservation:

ARAVEN **pioneered the incorporation of a permanent label** that indicates the temperature for refrigerators and microwaves, the type of food that can be stored, and its compliance with HACCP/APPCC food safety regulations **and ColorClip system in its airtight containers** to identify the food to be stored and to prevent cross contamination. ARAVEN's airtight containers provide full **food hygiene guarantees for preserving foodstuffs**

Handling and preparation:

ARAVEN's products help **prevent, reduce or eliminate potential hazards** at different stages of food preparation and handling.

Service and display:

ARAVEN has an extensive range of products for serving and displaying food, which **have been carefully designed with functionality** in mind and to respond to the needs of both serving and kitchen staff.

Transport:

ARAVEN **preserves food at the correct temperature during transport,** maintaining the cold chain to **prevent the growth and multiplication of microorganisms that could affect food quality and safety.**

Cleaning:

ARAVEN's waste bins are **essential partners in implementing HACCP systems** in cleaning processes.

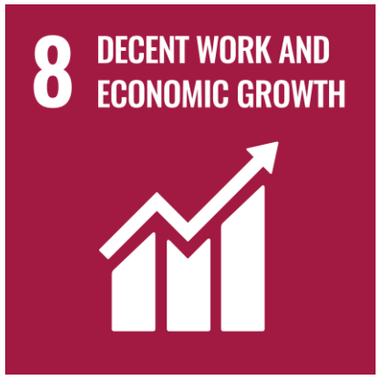
1.8 Our SDGs and strategic pillars

Priority SDGs

There are **5 priority SDGs** for ARAVEN in which, due to their impact, we can have the greatest influence and make the most improvement in the short and medium term:

Gender Equality

Within and outside the company, **gender equality** must be a fundamental priority to advance the adoption of policies and procedures to guarantee equal pay and employment opportunities for women, in areas such as pay equity, professional development, representation in governing bodies, and work-life balance, among other aspects, thus fostering economic growth and social development.



Decent work and economic growth

ARAVEN is committed to **quality work based on policies that respect the labor and human rights** of all workers throughout the value chain. Promoting sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all is crucial.

It is considered essential that there be alignment between business growth and ethics and social development in the performance of the activity.

Industry, Innovation and Infraestructure

For ARAVEN, innovation has been and remains a strategically key aspect, aiming to offer differentiating products and services adapted to new market requirements and meet the needs and expectations of stakeholders. Advocating for **sustainable innovation** through ecodesign is established as a cross-cutting principle of our work to transform society and build responsible solutions that minimize negative impacts, sustain and improve people's lives.

Responsible consumption and production

We are aware that conventional production models entail significant **resource depletion** through the use of raw materials, energy, water, and other goods, causing damage to ecosystems not only through consumption but also through their transformation into emissions, waste, and other sources of energy. That's why we consider it essential to extend the useful life of these resources and transition to a circular economy model with special emphasis on the recovery and reuse of waste.

Climate action

ARAVEN is committed to **combating climate change**. The action plan includes cross-cutting initiatives, for example, including strategies directly related to greenhouse gas (GHG) emissions in the development of its business, through efficiency and the transition of energy consumption to renewable sources.

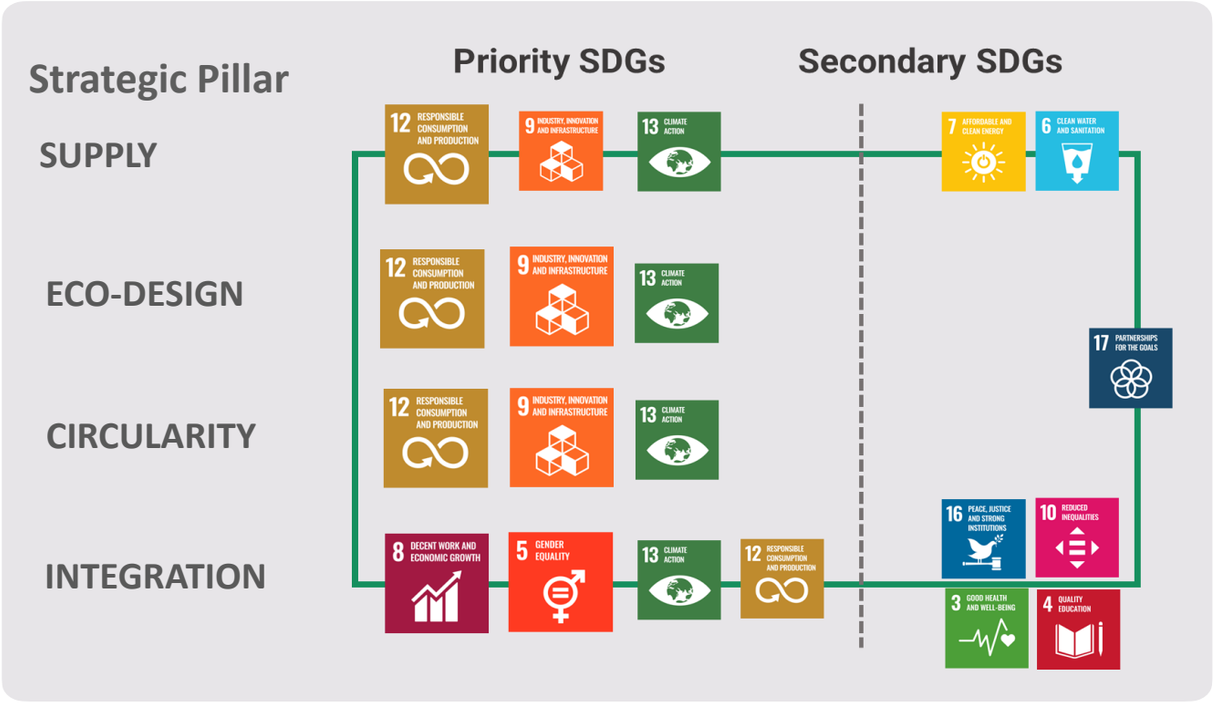
1.8 Our SDGs and strategic pillars

Secondary SDGs

Furthermore, also aligned with the company's strategy, efforts, and resources, **7 secondary objectives were determined:**

Strategic Pillars

Based on this, we established the **four strategic pillars** of ARAVEN's environmental, social, and governance sustainability in alignment with the primary and secondary SDGs.



- **Supply**

It encompasses subpillars such as **green purchasing policy**, sustainable suppliers, **eco-efficiency and eco- effectiveness**, **and waste management**. In addition to internal actions, it involves evaluating the value chain in order to advocate for a more responsible one.

- **Eco-design**

These include **life-cycle analysis** lines that assess the impacts produced at all stages of a product's existence, the introduction of eco-design to prevent negative impacts in new developments and redesigns of existing products, shifts to recycled and biomaterials, and technological monitoring of advances in the sector.

- **Circularity**

Through **carbon neutrality** approaches, promoting actions to reduce and offset the corporate footprint across its three scopes: Zero Waste to reintroduce production losses into processes, are some examples of how to achieve this goal.

- **Integration**

It encompasses the dimensions of social sustainability and governance. Lines of action include engaging the entire workforce through awareness-raising and best practices, implementing CSR collaborations into projects with an impact on society and the environment.

1.9 Main Magnitudes – Data and Figures for 2025

29M€ Turnover

11M€ SPAIN AND PORTUGAL

18M€ INTERNATIONAL

+80 COUNTRIES

+1.200 Attending to over 1200 clients

32,5% SPAIN AND PORTUGAL

67,5% INTERNATIONAL

53 Employees

57% WOMEN

43% MEN

80% Template that makes use of existing work-life balance measures

11 años Average seniority

+26.600€ Investment in training

0,72 t CO2e/M euro (-63% versus 2024)

CO2 emissions (Scopes 1 and 2) on gross sales

44% Consumption of energy from renewable sources

Origin of the marketer

Since June, Araven has had an electricity supply with GDO

98% Recycled Waste

This represents a 21% increase compared to the previous year.

478 Trained hospitality professionals and students

35 Registrations and patents

+1M€ Invested yearly in R&D

100% % Projects developed vs. budgeted

Corporate Social Responsibility

6.000€ Investment in CSR

4 CSR actions

68% Local Suppliers Evaluated

1.10 Labels, recognition and accessions

CERTIFIED
ISO 9001
ISO 14001
BUREAU VERITAS

ARAVEN S.L.U. is certified under a quality and environmental management system by Bureau Veritas against ISO 9001:2015 and ISO 14001:2015.

SILVER | Top 15%
ecovadis
Sustainability Rating
SEP 2026

You can access our recognition page via the QR code.

SELLO 2023 ARAGÓN CIRCULAR

EQA
Huella de Carbono Verificada
GHG Protocol
CO_2 Calculado
Certificado Nº 02.589.848-HC

REDUZCO 2024 CALCULO COMPENSO 2
GOBIERNO DE ESPAÑA
MINISTERIO PARA LA TRANSICIÓN ECOLÓGICA Y EL RETO DEMOGRÁFICO

SELLO DE PYME
RSA
RESPONSABILIDAD SOCIAL DE ARAGÓN
2025
CEPYME · CCOO · CEOE ARAGÓN · UGT Aragón
GOBIERNO DE ARAGÓN

APOYAMOS EL PACTO GLOBAL
UN GLOBAL COMPACT

ecoembes

"Since 2025, ARAVEN, S.L.U. has been committed to the corporate responsibility initiative of the United Nations Global Compact and its principles in the areas of human rights, labor, environment and anti-corruption."

1.11 Stakeholders - Collaborators and Partnerships

FACYRE
(www.facyre.com)

BASQUE CULINARY CENTER
(www.bculinary.com/es/home)

02.

Code of Ethics

araven
FOOD SAFETY INNOVATION

CFS BRANDS
DESIGNING VALUE.
DELIVERING SUCCESS.

PEOPLE

OUR PEOPLE

The development and creation of products for the hospitality sectors are an inherent part of ARAVEN, 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, **we handle products and empower people, regardless of their identity, beliefs and/or gender, while firmly rejecting, in particular, the use of child labour at any stage of our processes and interactions.**

2.1 Non-Discrimination – Safety and Health – Development

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.

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.

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.

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'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 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's IT systems.

The computer equipment, systems and programmes that ARAVEN 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's rules or instructions is prohibited.

2.2 Confidentiality and Data Protection

Confidentiality. Reserved or privileged information and the protection of personal data

At ARAVEN, 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 to protect information and knowledge generated within the organization, or owned or safeguarded by ARAVEN.

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'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, 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'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'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*
- *Intellectual and industrial property, such as industrial secrets, trademarks, patents and copyrights*
- *Lists of clients and suppliers, and price structures and policies*

2.3 Gifts and presents

ARAVEN'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'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, 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'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 General Management of Araven, S.L.U.

✓

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'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 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'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.

BUSINESS CONDUCT

CONTEXT

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

2.4 Regulatory Compliance

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

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

ARAVEN's members must fulfil the following general responsibilities in matters concerning legal compliance:

- In the performance of their work, to conduct themselves in accordance with ARAVEN'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'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 Director and/or Compliance Assistant, encouraging everyone else to do so.
- To cooperate with Compliance Director and/or Compliance Assistant, 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 Director and/or Compliance Assistant.
- To adhere to ARAVEN'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 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 General Management of Araven S.L.U.

2.5 Smuggling, Money Laundering and/or Terrorism

Prevention of smuggling

ARAVEN 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.

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.

Policy on Money Laundering and the Funding of Terrorism

In order to prevent money laundering and the funding of terrorism, ARAVEN's members must follow the following guidelines:

- 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.

** For further information, see: Gifts and presents. Confidentiality*

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CONTEXT

CLIENTS

ARAVEN 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.

2.6 Clients

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.

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'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 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'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.

** For further information, see: Gifts and presents. Confidentiality*

SUPPLIERS

CONTEXT

Relationships of **trust with suppliers**, to the **mutual benefit of both**, have contributed to the success of ARAVEN. 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**.

2.7 Suppliers

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, 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 in need of a new supplier must bear in mind the minimum requirements established in the document ARAVEN 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 requires of its suppliers.

Relations with suppliers

ARAVEN 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 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.

Commitments

One of ARAVEN'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'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'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.

** For further information, see: Gifts and presents. Confidentiality*

COMPETITORS

CONTEXT

ARAVEN exports its products to many countries with differing legislation and regulations on free competition. For this reason, ARAVEN'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.**

2.8 Competitors

Sales or market information

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

ARAVEN'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'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's members have a duty to inform the General Management of Araven, S.L.U of any potential agreement that might contravene this code.

MANAGEMENT OF THE CODE OF ETHICS

In order to promote the application of ARAVEN'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 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'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 worker's immediate superior
- The Human Resources Department

Disciplinary system

ARAVEN'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.

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.
- 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'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.

03.

Integrated Management System

3.1 Scope

ARAVEN S.L.U. has **certified** its Quality Management System and its Environmental Management System according to ISO 9001:2015 and ISO 14001:2015, respectively, with the following **scope**:

"Design, development, production management and marketing of products for food preservation and handling, serving and display, catering transport and cleaning in the hospitality sector".

ARAVEN S.L.U. is certified under a quality and environmental management system by Bureau Veritas against ISO 9001:2015 and ISO 14001:2015.

Applicability: ARAVEN S.L.U. applies all the requirements of the ISO 9001:2015 and ISO 14001:2015 standards in relation to the afore mentioned scope.

ARAVEN S.L.U. has **implemented an Integrated Management System** that applies all the requirements of the Quality Management System under the **ISO 9001:2015** standard and the Environmental Management System under the **ISO 14001:2015** standard in the activities of the scope indicated above.

ISO 9001 **Quality Management System**

ISO 14001 **Environmental Management System**

3.2 Processes and Interactions

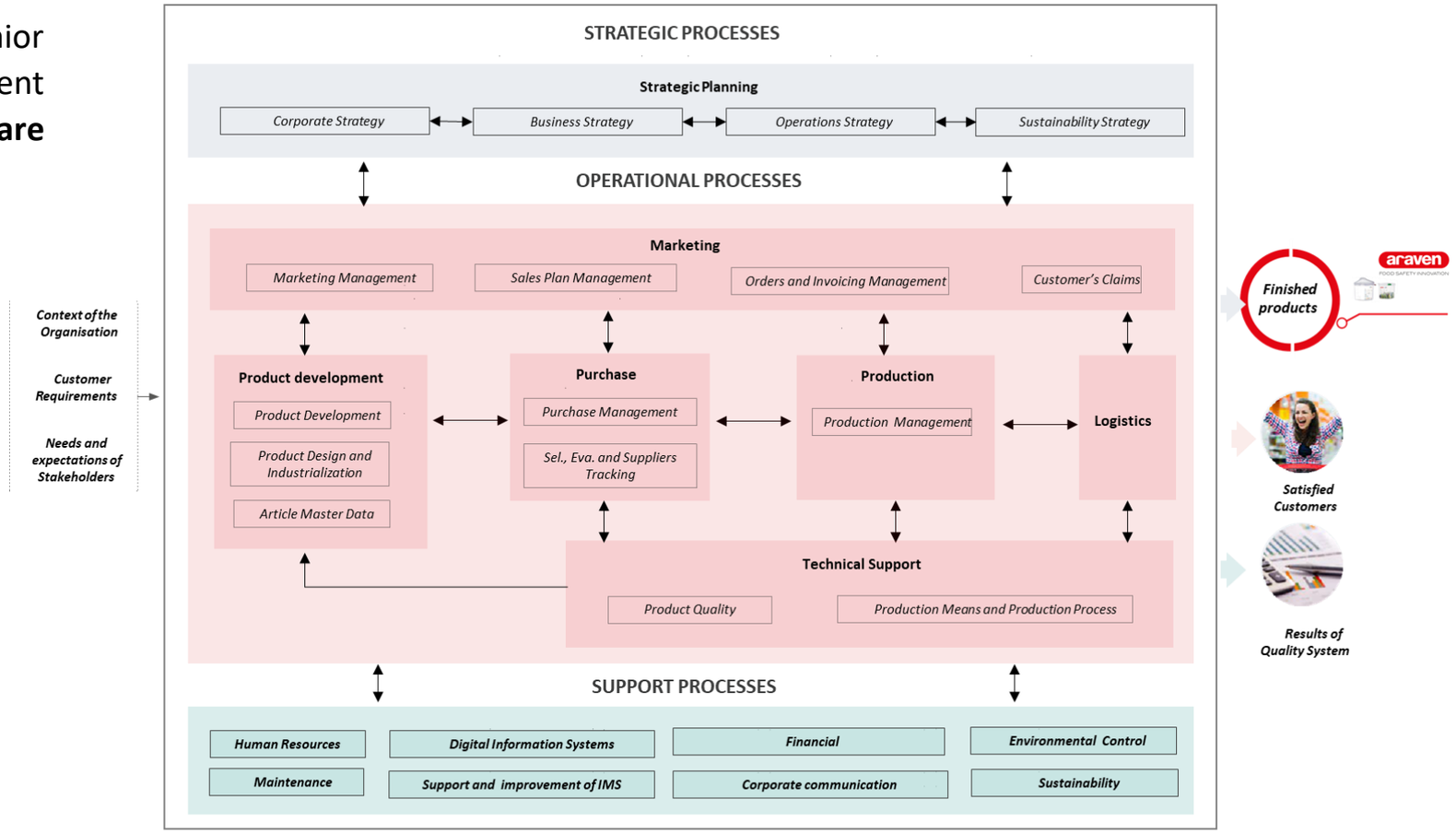
ARAVEN S.L.U. manages by processes, a methodology that has been promoted from the convincement of managing all the performed activities, their interactions and compliance aligned with standards of recognized prestige implemented in the company such as ISO 9001:2015 and ISO 14001:2015.

Below are the processes identified by Senior Management through the Integrated Management System **Process Map**, where their **interactions are reflected based on three categories**.

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 deliveryProcesos operativos.

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.

04.

Quality Policy

4.1 Quality Policy

ARAVEN S.L.U. has a **mission to offer their customers innovative solutions** in all the different sectors we are acting on, always bearing **sustainability** in our 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 organization.

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 organization and to our interested parties, ensuring its compliance and keeping it up to date at all levels, regularly monitoring its effectiveness and compliance.

Version 00 / Approved by Christophe Bergamo (CEO)

05.

Environmental Policy

5.1 Environmental Policy

At ARAVEN S.L.U. company dedicated to the **design, development, production management and marketing** of products for food preservation and handling, serving and display, catering transport and cleaning **in the hospitality sector** we are aware of the importance of **sustainable development**, minimizing the global environmental impact associated with our activity.

Within this framework, **our fundamental principles** at ARAVEN S.L.U. for the prevention, minimization or elimination of impacts on the environment 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.
- Promoting our environmental commitment to our **suppliers and customers** in order to involve them in it.
- Committing ourselves to the **protection of the environment and the prevention of environmental pollution**, properly managing the environmental aspects derived from our processes and activities.
- **Continuously improving the performance** of our activities to minimize the water and energy consumption in our processes and the generation of waste by providing means for its recycling, whenever possible, favoring its management.
- **Integrating environmental management** into our daily operations, ensuring that environmental issues are addressed, while providing quality products and services to our customers.
- **Reducing our Carbon Footprint** (emission of GHG (Greenhouse Gases) Scopes 1, 2 and 3 or Categories 1 to 6) by at least 4% annually (Horizon 2023-2025) as a strategic objective of ARAVEN S.L.U.

This policy **applies** to the whole of ARAVEN S.L.U. in compliance with the above points and in the management of the environmental value of the activities, raising awareness and sensitizing by ARAVEN S.L.U. on good environmental and social practices made available to the entire organization.

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.

Finally, we are committed to periodically **reviewing** this environmental policy and communicating it throughout the organization and to our stakeholders.

06.

Sustainable Collaboration Policy

6.1 Sustainable Collaboration Policy

At ARAVEN S.L.U., company dedicated to the **design, development, production management and marketing** of products for food preservation and handling, serving and display, catering transport and cleaning in **the hospitality sector**, as part of our strategic sustainability plan and within the **INTEGRATION** pillar, we are committed to **collaborating and providing support that adds value to society through external entities** that contribute to sustainable development through socially and environmentally responsible projects.

Within this framework, **our fundamental principles** at ARAVEN S.L.U. **regarding external collaborations within the framework of Corporate Social Responsibility** (CSR) are:

- Commit to supporting actions **aligned** with the **5 priority SDGs**, without excluding those that may have an impact on the **7 secondary SDGs defined by the company**.

- Prioritize collaborations on projects aimed at **preventing, minimizing, or eliminating negative impacts on the environment and people's well-being** that may be linked to our activity and the development of processes throughout our value chain.

- **Integrate,** as far as possible, **cross-cutting collaborations** in which, in addition to support through financial and/or material donations, the **direct participation of company personnel** is promoted, for example through volunteering, encouraging engagement and inclusion in the context and environment of the project's development**.**

- **Promote** cooperation with **local or community-based organizations**, especially those with fewer resources or funding. In this regard, prioritize **support for medium- and long-term plans**.

Compliance with this Sustainable Collaboration Policy is a commitment that has the full support of senior management and its support for the sustainable development of ARAVEN S.L.U.

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