



GLOBAL
DAIRY
VENTURES

Supplier Code of Conduct





I. INTRODUCTION

- Global Dairy Ventures' Commitment to Sustainability and Ethics.
- Purpose of the Code of Conduct.

II. SCOPE OF APPLICATION

- Applicability to Suppliers, Subcontractors, and Third Parties.
- Mandatory Nature and Compliance Monitoring.

III. PRINCIPLES AND REQUIREMENTS

- Legal Compliance and Business Ethics.
- Human Rights and Working Conditions.
- Environmental Protection.
- Animal Welfare.
- Food Quality and Safety.
- Data Protection and Confidentiality.

IV. ASSESSMENT AND COMPLIANCE

- Audits and Oversight Activities.
- Corrective Measures and Violations.
- Reporting Channel.

V. CONTINUOUS IMPROVEMENT: APPROVAL, REVIEW AND COMMUNICATION

VI. COMPLIANCE COMMITMENT



I. INTRODUCTION

At Global Dairy Ventures (GDV), we believe in a business model grounded in sustainability, ethics, and social responsibility. Our relationship with suppliers is fundamental to ensuring that our products and services meet the highest standards regarding environmental and social impact.

This Supplier Code of Conduct outlines the minimum commitments that all companies collaborating with GDV or any of its affiliates, such as Iberconseil, Disalp, and Adonis, must adhere to. It is based on the principles of the United Nations Global Compact, International Labour Organization (ILO) conventions, and B Corp standards, promoting fair, ethical, and sustainable business relationships.





II. SCOPE OF APPLICATION

This Code applies to all suppliers, subcontractors, and third parties with whom GDV maintains commercial relationships. Compliance with these principles is mandatory, and adherence will be periodically evaluated.

To detail the commitments that guide us in achieving this goal, Global Dairy Ventures has developed this Supplier Code of Conduct (hereinafter referred to as the “Supplier Code”).





III. PRINCIPLES AND REQUIREMENTS

III.I. LEGAL COMPLIANCE AND BUSINESS ETHICS

Suppliers of Global Dairy Ventures (GDV) must:

Anti-competitive Behavior

- Take **preventive measures** to avoid anti-competitive practices, such as **collusion, price manipulation, and abuse of dominant position**.
- **Not participate in agreements** that limit free competition or harm market fairness.
- Inform GDV of any **suspected unfair competition or situations** that may compromise market integrity.





Prevention of Corruption and Bribery

Suppliers must:

- Comply with all **anti-corruption and anti-bribery** laws and regulations in the countries in which they operate.
- **Not offer, receive, or facilitate bribes, improper gifts, or favors** that may influence business or governmental decisions.
- Implement **internal ethics and compliance policies** to ensure adherence to these principles.

Conflicts of Interest

- Suppliers must **avoid any situation that could create a conflict of interest** in their relationship with GDV. This includes:
 - **Personal or family relationships** with GDV employees involved in purchasing decisions.
 - Participation in **business dealings** that could compromise the supplier's impartiality.
- In the event of a potential conflict of interest, the supplier must **immediately inform** GDV for evaluation.



III.II. HUMAN RIGHTS AND WORKING CONDITIONS

At **Global Dairy Ventures (GDV)**, we believe in the dignity of work and the promotion of **human rights** throughout our supply chain. We are committed to working exclusively with suppliers who respect and promote the following principles:

Respect for International Human Rights Standards

GDV suppliers must comply with international human rights principles and regulations, including:

- Universal Declaration of Human Rights (1948).
- International Covenant on Civil and Political Rights (1966).
- International Covenant on Economic, Social and Cultural Rights (1966).
- ILO Conventions on child labor and forced labor (Conventions 138, 182, and 29).
- The 10 principles of the United Nations Global Compact.

Suppliers must **not be complicit in any human rights violations** and must adopt measures to prevent negative impacts in their operations and supply chains.

Protection of Indigenous Communities and Vulnerable Groups

GDV requires its suppliers to respect the **rights of indigenous communities and vulnerable populations**, ensuring that:

- **They do not engage in activities that negatively impact** the rights, natural resources, or territories of these communities.
- **They respect free, prior, and informed consent** before undertaking any activity that may affect them.
- They implement **non-discrimination** policies and guarantee equal opportunities for employment and development.



Prohibition of Child and Forced Labor

- Child labor is strictly prohibited throughout the supply chain, in compliance with ILO Conventions 138 and 182.
- Suppliers must ensure that no worker is coerced, exploited, or subjected to servitude, as per ILO Convention 29.
- Implementation of systems to detect and prevent child and forced labor is required, including internal audits and risk assessments.
- If cases of child or forced labor are identified, the supplier must immediately implement an action plan and report it to GDV.

Working Conditions and Decent Wages

- All suppliers must pay decent wages that meet the basic needs of workers and their families, even in countries where local law does not mandate an adequate minimum wage.
- Withholding wages or personal documents as coercion is strictly prohibited.
- Working hours must comply with national and international regulations, ensuring appropriate breaks and safe working conditions.

Occupational Health and Safety

- Suppliers must provide a safe and healthy working environment, minimizing occupational hazards.
- Safety protocols, emergency plans, and access to basic medical care must be implemented at all facilities.
- Periodic training on risk prevention, industrial safety, and first aid must be provided.
- Workplace accidents and occupational illnesses must be monitored, with continuous improvement plans in place.



Freedom of Association, Social Dialogue, and Protection Against Retaliation

- Workers must be guaranteed the **right to freely associate, engage in collective bargaining, and** join unions without interference.
- Suppliers must maintain **open and constructive dialogue** with employees and their representatives to improve working conditions.
- **Zero tolerance for retaliation:** no worker shall be threatened, dismissed, or discriminated against for exercising their rights to representation.

Diversity, Equality, and Inclusion

- Suppliers must ensure **equal treatment and opportunities** without discrimination based on **gender, age, ethnicity, religion, sexual orientation, disability, or social status**.
- Active promotion of **diversity in hiring** is encouraged, **including women, people with disabilities, and vulnerable groups**.

Suppliers must also ensure that **working conditions are fair and documented**, that contractual terms are **clear, voluntary, and freely agreed** upon, and that all local and international labor laws are observed, including those related to hours, overtime, rest, leave, maternity, and paternity.

Suppliers are encouraged to promote social dialogue, maintain open communication about work conditions and operational changes, and implement ongoing training and development programs to support professional growth.



III.III. ENVIRONMENTAL PROTECTION

At **GDV**, we believe sustainability is a continuous and collaborative improvement process. We are committed to reducing our environmental impact and working with suppliers who share this vision, adopting responsible practices regarding resource use, waste management, and emissions reduction.

GDV suppliers must **comply with environmental regulations** in their countries of operation and promote **good environmental practices** in line with their capabilities and context. It is encouraged that suppliers:

- **Gradually reduce greenhouse gas (GHG) emissions** in their operations and across the value chain, addressing Scopes 1, 2, and 3 where possible.
- **Prevent and minimize pollution and spills**, especially through safe handling of chemicals, hazardous waste, and uncontrolled emissions.
- **Protect biodiversity and ecosystems**, ensuring no negative impacts on protected habitats or high conservation value areas.
- **Optimize water use and properly manage wastewater** to minimize impacts on local communities and ecosystems.
- **Promote circularity and ecodesign**, reducing use of non-recyclable materials and favoring sustainable packaging.
- **Improve waste management** by prioritizing reduction, reuse, and recycling over disposal.
- **Encourage responsible use of natural resources**, particularly in agriculture and food production, promoting sustainable practices.

Recognizing that each supplier is at a different stage in their sustainability journey, GDV encourages dialogue and collaboration to advance these practices. Suppliers are encouraged to regularly assess their environmental impacts and seek improvement opportunities aligned with these principles.



III.IV. ANIMAL WELFARE

At GDV, we recognize **animal welfare** as a fundamental part of a responsible and ethical supply chain. We require suppliers of animal-derived products to **comply with applicable local and international legislation and to adopt practices that ensure animal protection and dignified treatment throughout the value chain.**

Suppliers must ensure their activities—directly or via representatives or sub-contractors—are conducted **without cruelty or unnecessary suffering.** They are encouraged to continually improve conditions for raising, transporting, and slaughtering animals, ensuring ethical and sustainable standards.

Minimum Supplier Commitments

Legal compliance: Operate in accordance with national animal welfare laws and the strictest international standards.

Adoption of recognized certifications, such as Global GAP, Certified Humane, Welfare Quality, EU Regulation 1099/2009, or equivalents.

Prohibition of cruel practices or mistreatment, ensuring dignified conditions during rearing, transport, and slaughter.

Promotion of sustainable production systems that prioritize animal welfare and reduce reliance on intensive practices.



Animal Welfare Principles

Suppliers must **uphold the Five Freedoms of Animal Welfare**, as defined by the World Organisation for Animal Health (WOAH):

1. **Freedom from hunger, thirst, and malnutrition**, through constant access to clean water and proper food.
2. **Freedom from fear and distress**, by providing a calm environment free from aggressive treatment.
3. **Freedom from physical and thermal discomfort**, through adequate environmental conditions.
4. **Freedom from pain, injury, and disease**, via veterinary care and health prevention.
5. **Freedom to express natural behavior**, with sufficient space and appropriate environmental enrichment.

Specific Practices in the Supply Chain

GDV expects its suppliers to focus on the following practices in animal **farming, transport, and slaughter**:

- **Avoid extreme confinement** in tight spaces and promote farming systems that allow greater mobility.
- **Ban cloning and genetic engineering** in animal production.
- **Implement environmental enrichment** tailored to each species to support natural behaviors.

Responsible Use of Medication and Feeding

- **Gradually eliminate prophylactic antibiotic use**, limiting use to curative treatments prescribed by a veterinarian.
- **Avoid using growth-promoting substances** such as hormones or synthetic analogs.
- **Ensure a balanced, natural diet free of ingredients** harmful to animal health.



III.V. FOOD QUALITY AND SAFETY

At **GDV**, we ensure the quality, safety, and traceability of our products throughout the supply chain. We work only with suppliers who comply with the **highest standards of food safety, risk management, and quality certifications**, aligned with **EU regulations** and **continuous improvement** principles in the food industry.

Suppliers must operate in compliance with **all relevant EU laws** and **adopt quality management systems** based on **recognized standards**, including **periodic performance assessments**.

Minimum Supplier Requirements

- Compliance with EU food safety regulations, including:
 - **Regulation (EC) No. 178/2002**: General food law principles and product traceability.
 - **Regulation (EC) No. 852/2004**: Food hygiene.
 - **Regulation (EC) No. 853/2004**: Hygiene rules for food of animal origin.
 - **Regulation (EU) No. 1169/2011**: Food information to consumers (labeling and allergens).
 - **EU “Farm to Fork” Strategy** to promote sustainability in food production.
- Implementation of the **HACCP (Hazard Analysis and Critical Control Points)** system to identify and control production risks.
- **Full traceability** of ingredients, components, and finished products, with updated and accessible records.
- Compliance with recognized international standards and regulations, such as:
 - **ISO 22000** (Food Safety Management).
 - **FSSC 22000**, **BRCGS (British Retail Consortium)**, or **IFS (International Featured Standards)**, depending on supplier sector.



- Application of certification **procedures, internal audits, and quality assessments** across all product life cycle stages:
 - **Product concept development.**
 - **Research and development.**
 - **Production and processing.**
 - **Storage, distribution, and Supply.**
 - **Waste management, reuse, donations, or recycling (if applicable).**

Additional Commitments

- **Responsible use of ingredients:** Avoid additives, preservatives, or substances prohibited under EU or national law.
- **Allergen control and transparent labeling** in compliance with **Regulation (EU) No. 1169/2011.**
- **Process optimization to reduce food waste,** promoting reuse, donations, or recycling in line with EU waste reduction goals.
- **Animal welfare commitment:** Suppliers of animal-derived products must comply with ethical production standards and certifications such as **Global GAP, Certified Humane, or Welfare Quality (or EU equivalents).**

Continuous Improvement

Suppliers are encouraged to implement continuous improvement **programs in food quality and safety** and stay up to date with evolving EU regulations.



III.VI. DATA PROTECTION AND CONFIDENTIALITY

Suppliers must:

- Comply with personal data protection regulations (such as the EU General Data Protection Regulation – GDPR) and ensure information security.
- Maintain the confidentiality of GDV's and its clients' commercial data and information.



IV. ASSESSMENT AND COMPLIANCE

IV.I. AUDITS AND OVERSIGHT

GDV will **conduct periodic** audits of its suppliers to assess compliance with this Code of Conduct. These audits may include:

- Document review of **certifications and environmental and social records**.
- On-site inspections to verify working and environmental conditions.
- Surveys and employee interviews to evaluate workplace well-being.





IV.II. CORRECTIVE MEASURES AND VIOLATIONS

In the event of a violation, GDV may:

- **Request a corrective action plan** with set deadlines.
- Impose **sanctions or commercial restrictions** for serious violations.
- In extreme cases, **suspend or terminate the business relationship** with the supplier.

IV.III. REPORTING CHANNEL

GDV provides a **confidential channel** to report any violations of this Code of Conduct, guaranteeing whistleblower protection.

For any questions about interpreting or applying this Code, suppliers can contact their GDV or affiliate representative.

Confidential communication channels are also available for reporting potentially inappropriate behavior or violations of the Code or the law:

Mail: Compliance Committee

Global Dairy Ventures

Av. Diagonal 561, 4th floor – 08029 Barcelona, Spain

Email: wbchannel@globaldairyventures.com



V. CONTINUOUS IMPROVEMENT: APPROVAL, REVIEW AND COMMUNICATION

This Supplier Code of Conduct will be subject to continuous **review and improvement**, especially when business circumstances require it. In any case, it will undergo a regular annual review and, if necessary, appropriate updates.

Communication and awareness initiatives will also be carried out so that those involved in purchasing and procurement at GDV understand the tools available to promote a responsible supply chain across all affiliates and within GDV.

This Code came into effect on April 1, 2025, and is available to all purchasing team personnel through regular internal channels.

