

Code of Ethics and Business Conduct



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Presentation letter

Dear All,

This Code of Ethics and Business Conduct of AmRest Holdings SE and its subsidiaries contains our principles, values and commitments as an organisation.

AmRest has built a reputation as a reliable and trustworthy group over many years. However, the improper actions of just one employee could damage our reputation in the blink of an eye. For this very reason, at AmRest we make every effort to prevent and avoid particular behaviours in each and every country where we operate.

That is why it is necessary to establish our own Code of Ethics and Business Conduct to summarise, organise and update the basic principles and values that must govern our day-to-day activities. This Code is another important tool in the growth and success of a Group such as ours.

At AmRest we believe that conduct and good practices are much more than a statement of intent, and therefore everybody who forms part of the Group must undertake to observe and comply with the behavioural guidelines in this Code.

This document is a tool to direct and guide us in relation to social, corporate, and ethical matters that are of particular importance both to our Group and each and every one of us. Our reputation and future as a benchmark company depend on us continuing to conduct business in accordance with this Code every day in all of our activities.

At AmRest we would like to express our gratitude for all your commitment to observing, communicating and ensuring compliance with this Code. This shall undoubtedly contribute to our goal of transforming AmRest into one of the leading companies in the restaurant industry.





I. Introduction to the Code of Ethics and Business Conduct

What is the Code?

AmRest's commitment to ethics and compliance with the law is a fundamental part of our culture. Observance of the law, promotion of sustainable practices and compliance with our Code of Ethics and Business Conduct (hereinafter, the "**Code**"), form part of our commitment to **integrity and professional excellence**.

Our Code establishes guidelines and rules of conduct to be followed by all those who form part of the Group. This Code reflects our commitment to doing the right thing in all our interactions with stakeholders, such as co-workers, customers, business partners, authorities and local communities.

Although the Code does not address all the situations that may arise; it does provide clarification and guidance on those that may give rise to ethical dilemmas. Occasionally, making a good decision can be a complex process, and, with this in mind, defined frameworks for action address situations requiring corporate guidelines. In these situations, **any inappropriate or improper conduct could compromise our ethics culture**, damage the Group's reputation and even give rise to serious penalties.

Purpose

The purpose of this Code is to provide the AmRest Group with a fundamental tool to serve as the cornerstone for our business activities. It establishes the code of conduct to be observed both while undertaking our professional duties and in our relationships with co-workers, customers, suppliers, business partners and other stakeholders.

Scope

This Code applies to the Board of Directors and to all the Employees of the AmRest Group, without exception, regardless of their position, responsibilities or geographical location.

As a Group Policy, the Code of Ethics and Business Conduct has been adopted by AmRest at an international level and, accordingly, its provisions are applicable to all the subsidiaries that form part of the Group.

Additionally, persons who act for or on behalf of AmRest, but do not form part of its organisation, shall adhere to the provisions of this Code and undertake to act in accordance with it when exercising their functions.

As part of AmRest, we shall strive to ensure that that our Business Partners comply with the ethical standards of this *Code of Ethics and Business Conduct*.

Obligation to be familiar with the Code

All Personnel must familiarise themselves and comply with the Code, and cooperate to facilitate its implementation throughout AmRest which includes reporting any breach of the Code of which they become aware through AmRest's whistleblowing channel.

Personnel must observe the provisions of the Code as an integral part of the other Regulations that govern AmRest's business activities.



II. Purpose, vision, mission and values

Our main purpose

Service is our recipe for winning

Vision

What do we want to achieve?

To become the European leader who inspires the global restaurant industry

Mission

How will we make this vision a reality?

Winning our guests' hearts through unique service, product and experience in our restaurants delivered by passionate AmRestees makes our scalable and sustainable brands thrive.

Values

The fundamental beliefs we share on how each of us wants to act and be treated:

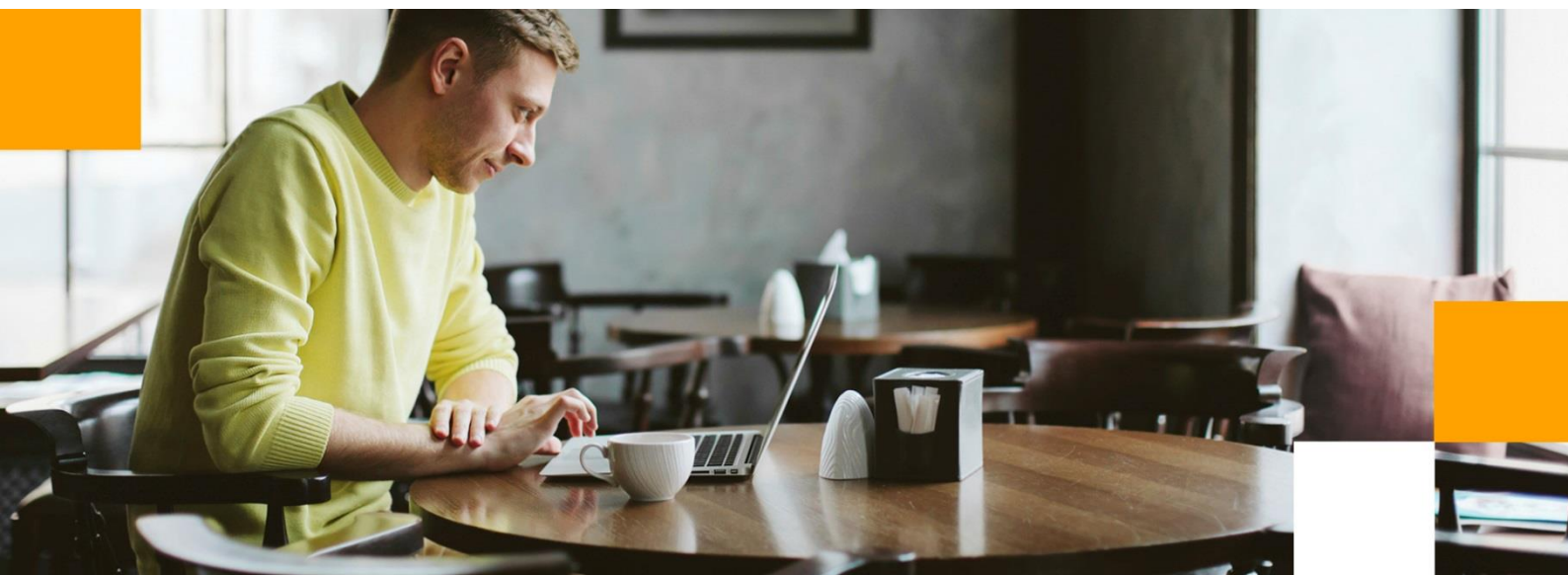
Trust – by offering certainty to our customers, employees, investors and partners

Fairness - by honoring our dues, living an honest life and doing good unto others

Loyalty – by respecting our company, employees and partners, through our commitment and engagement

Prudence – by acting adequately and with no precipitation

Responsibility – by being committed to the society and environment in every decision





III. Code of conduct and behavioural guidelines

In line with our **Values**, AmRest personnel shall act in accordance with the following standards:

1. Respect for...

The law

One of the basic rules governing any kind of conduct at AmRest is **strict compliance with the law**. In this sense, we shall respect and comply with the legislation and international regulations applicable to the business activities we undertake at AmRest. No member of AmRest shall use third parties to carry out acts that are prohibited by law or by this Code.

We must be familiar with the legislation that impacts our respective areas of activity. Therefore, we must ensure that employees receive adequate information and training to enable them to understand and comply with the legal and regulatory obligations applicable to their position.

Our customers

In line with our mission of “winning our customers’ hearts”, our behaviour must be based on efficiency, professionalism, service and collaboration, seeking our customers’ **utmost satisfaction**, providing them with the best experience when they visit us and guaranteeing excellent quality in both our products and services.

Our employees shall always be friendly and helpful, and information given to customers should be clear and correct. Customers will receive all the assistance required to submit queries and complaints through the appropriate channels.

We shall treat all our clients fairly, with discretion and respect; each one being unique. They must never be put in an uncomfortable situation or have their values or privacy compromised.

The **quality** of our products and our services is one of AmRest’s fundamental pillars. By no means, whatever position we find ourselves in, shall we compromise the quality of our products and services. Therefore, we must be familiar with quality standards and procedures as well as the food safety legislation in each of the countries in which we operate.

We show great diligence in adhering to standards and procedures so that our customers, external as well as internal, receive professional services and products of the highest quality. We want every customer to feel like they are unique.



Always:

- comply with the customer care, food safety and quality standards and procedures;
- take immediate action to address customer complaints, and;
- exceed customers' expectations.



Never:

- put the customer in an uncomfortable situation or undermine their privacy e.g., by taking photos without prior explicit consent; or
- treat the customer disrespectfully.

Public authorities

Our relationships with public or government institutions and their representatives shall be governed by the rules of **respect, collaboration, integrity, uniformity and ethical compliance** and, accordingly, we shall comply with their orders or decisions.

At AmRest we are aware of the importance of cooperating with public authorities and bodies. Accordingly, all interactions with public authorities are conducted in strict compliance with the provisions of the applicable legal framework.

In addition to avoiding any conduct aimed at evading payment of sums due to the tax authorities or any other public body, Personnel shall refrain from **fraudulently obtaining any type of improper advantage**, tax benefit or employee welfare benefit or grant.

We establish a code of conduct for cooperation with public institutions and administrations.

Third parties

Fair competition

At AmRest we are committed to competing fairly and achieving our business objectives in an ethical and lawful way. Accordingly, we require strict compliance with the legislation governing free and fair competition.

It is prohibited to attempt to restrict competition by:

- inducing a competitor or associate to breach an agreement with a third party;
- obtaining unauthorised access to the confidential information of our competitors;
- gaining an unfair competitive advantage through unethical or illegal business practices;
- any agreement interfering with commercial terms and conditions; and
- engaging in activities that might damage AmRest's reputation.

Our business partners

AmRest believes in professional collaboration with business partners (e.g. suppliers, franchisees) who conduct their business activities with high ethical standards. In this regard, we seek to **establish mutually-beneficial, long-term relationships with our partners**.

Therefore, we select our business partners with due diligence in compliance with the procedures in place at AmRest, whilst ensuring that they understand and respect the rules set out in this Code.

We maintain the integrity of our conduct and procedures, respecting the rules for fair competition, and the legislation in any given country. For instance, the Group shall never engage in any way with companies that hire minors or which labour conditions do not comply with the applicable legislation.

Society and local communities

We try to be responsible citizens of our local communities. We encourage our employees to **get involved in their communities and to support charities and projects which support sustainable development of the local communities**.

We value our good relationships with local authorities. We comply with local policies and legislation. When contacting local officials, we act with integrity. Corruption and bribery are unacceptable.



2. Honesty, integrity and transparency

Each of us must lead by example, basing our actions on professionalism, ethics, and integrity.

Conflict of interest

Business decisions and actions must be of benefit to AmRest and cannot be motivated by personal considerations or relationships.

We are obliged to avoid conflicts of interest or even the appearance thereof and to ensure that our external activities or personal and family interests do not adversely affect our ability to make ethical and objective decisions in the area of our responsibility.



Always:

- avoid exploiting for personal gain any business opportunity which has come to your attention through information obtained at the Group and in which AmRest has an interest, including a reasonable prospect of a business opportunity;
- make decisions in AmRest's best interest; and
- report any potential conflict of interest in accordance with our Whistleblowing Group Policy.



Never:

- engage in second employment or another professional or business activity that might enter into conflict with AmRest's interests or interfere in any way with your duties at the company;
- take part in making business decisions related to business partners where you, your relatives or acquaintances have financial interests; or
- engage in the process of hiring, promoting or supervising any members of your family or close friends employed in AmRest.

Bribery and corruption

AmRest prohibits any form of corruption, bribery, extortion or kickbacks. We must never receive, accept, provide or offer any payments or anything of value for the purpose of obtaining any kind of benefit, advantage or undue consideration, when interacting with public officials or business partners. In this regard, AmRest has established a rule of **zero tolerance for any act that could be perceived as corruption**.

Accordingly, we shall pay particular attention to:

- detecting if **undue benefit** or advantage is being obtained through exploitation of a position of influence;
- ensuring **proper accounting** of all payments and transactions in the corporate accounts; and
- establishing the appropriate **segregation of duties** at all levels of the company.

Facilitation payments, in the form of small payments made to public officials and authorities with the intention of expediting an administrative process, are prohibited.

Gifts and hospitality

In many cultures giving and accepting gifts, showing and receiving signs of hospitality are an important element when building a business relationship. However, it must never create a conflict of interest, impact on objectivity or influence the business decisions of the person receiving the gift.

Gifts, entertainment and hospitality may come in many different forms, such as: an invitation to a restaurant, a ticket or invitation to a sporting event or a Christmas gift box. Detailed guidelines and rules are contained in our Group's Gifts, Entertainment and Hospitality Policy.



Always:

- follow the rules described in Group's Gifts, Entertainment and Hospitality Policy;
- inform your supervisor or Local Ethics Committee if there is any possibility that the acceptance of a gift may give rise to a conflict of interest or contravene any applicable law; and
- when in doubt, consult the Group's Gifts, Entertainment and Hospitality Policy or contact your Local Ethics Committee.



Never:

- accept or offer gifts in the form of cash or cash equivalents; it is strictly prohibited;
- promise or offer gifts, entertainment or any other benefits to public and government officials; or
- accept gifts or entertainment from a supplier or potential supplier during a tender process, bidding or contract negotiations, or when it is known that a supplier or potential supplier shall take part in a tender process in the near future.

Donations and sponsorship

Donations and sponsorship form part of AmRest's corporate social responsibility policy and must always comply with the applicable legislation and internal rules.

Donations and sponsorship shall never be associated directly or indirectly with any unlawful or unethical practice, including corruption, and must always comply with the applicable legislation and internal rules. It is also necessary to ensure that the recipient of any donation or sponsorship meet the legal requirements for its receipt.

Political or associative activities

AmRest has no political affiliations. AmRest Employees have the right to participate in political activities if they act in their own name, after work hours, and if it does not influence the way they treat customers, colleagues and other people. Likewise it should not involve disrespecting minorities, religious beliefs or people's feelings.

When personally supporting any political organization, employees should avoid any direct or indirect involvement of AmRest or even the appearance of such involvement.

At AmRest we do not make direct or indirect donations or contributions to parties, organisations or committees of a political or trade union nature, or to representatives or candidates, except for those required by law.

Anti-money laundering (AML) and prevention of terrorist financing

Money laundering is an illegal process in which money obtained from illegal or criminal activity is converted into funds that appear to come from a legal source. Terrorist financing is the collection, distribution or provision of funds, which in whole or in part shall be used to finance a terrorist act.

At AmRest, we demonstrate our firm commitment **not to undertake such activities nor to do business with any individuals or entities involved** in money laundering or terrorist financing.

We also undertake to comply with all applicable current international legislation and provisions established to combat money laundering and terrorist financing.

Good accounting and tax practices

Transparency of information is vital to fostering trust, which is the guiding value of AmRest's practices. AmRest's business and financial records shall always be complete, accurate and truthful. Our financial statements and accounting records shall fairly reflect our economic, financial and equity position, in accordance with International Financial Reporting Standards and local generally accepted accounting principles. For these purposes, at AmRest we **shall not conceal or misrepresent the information in AmRest's business or accounting records and reports**.

All records and reports, irrespective of whether they are for internal use or external communication purposes, shall be **accurate, complete and reliable**, and fairly reflect the transactions and events, in accordance with the applicable accounting policies and the Group's internal controls. Wrongful alteration, concealment, destruction or falsification of documents is strictly prohibited.

Similarly, all documentation that AmRest submits as supporting documentation for grants requested shall be **truthful**. Grants or funds of a similar nature shall be used or applied exclusively for the purposes for which they were awarded.

Lastly, AmRest's business activities entail adopting a series of decisions with repercussions and impacts in the tax area. Accordingly, at AmRest we undertake **to comply with our tax obligations** in all those territories and jurisdictions in which we carry on our activities.

Transparency and integrity in our financial reporting is part of our corporate culture.

3. Respect in our workplace (employees)

*AmRest's objective is to promote and maintain a working atmosphere of **trust, fairness and good relations** between colleagues in order to cultivate responsible social conduct among all employees. This includes mutual respect for **personal dignity, privacy and the rights** of each individual.*

We are therefore committed to embracing the following code of conduct at the workplace:

Non-discrimination and diversity

At AmRest we respect and treat everyone equally, regardless of race, ethnic background, gender, religion, ideology, disability, age, sexual orientation, or any other aspects. We believe in nurturing a diverse and inclusive environment that helps us enrich our personal and professional development and achieve our business objectives.

Respect for human rights

We value and protect **basic human rights and public freedoms**. It is essential to be aware of the importance of respecting these rights and to be alert to possible violations, and to expect our business partners to uphold these standards.

Equal opportunities

A basic rule at AmRest is **to offer equal opportunities for employment and internal promotion**, fostering a merit-based corporate culture. Each of us should have the opportunity to reach our full personal and professional potential and contribute to AmRest's success.

We need to ensure that hiring, selection and promotion processes are governed by this objective, and that both employee selection and evaluation processes are fair and impartial.

Career development

At AmRest **we promote the personal and professional development of our employees**, fostering their involvement in improving their skills and competencies, and informing them of the performance evaluation policies. We base our selection, training and internal promotion policies on clear criteria related to skills, competencies and professional merit.

Anti-harassment

We are committed to preventing and resolving any cases of workplace or sexual harassment that may occur, taking disciplinary action where necessary, **to guarantee the dignity and integrity** of all.

Health & safety

At AmRest occupational risk prevention and health and safety policies are a priority to guarantee **a risk-free and safe working environment at all our facilities**. We place particular importance on ensuring a healthy, pleasant and respectful environment, avoiding harmful, aggressive or abusive behaviour and making responsible use of resources and facilities. The ongoing improvement of working conditions and safety at the facilities is one of AmRest's corporate objectives. Employees must always comply with internal health and safety policies and regulations.

Drugs, alcohol and controlled substances

We are committed to creating a **drug-and alcohol-free workplace** for the well-being and safety of all, in accordance with AmRest's rules and regulations.

Non-violence

Our **zero-tolerance policy against workplace violence** applies to behaviour on company premises, whether offices, factories, restaurants or parking lots, as well as to the behaviour of our employees carrying out AmRest's business anywhere in the world outside of our premises.

Work-life balance

At AmRest our goal is to **respect the personal and family life of our professionals** by promoting work-life balance policies, to achieve an optimum balance between personal and professional responsibilities.



Always:

- show respect to co-workers, customers, business partners, local authorities and communities in which we operate;
- follow all the relevant health and safety procedures; and
- ensure that the employment, promotion or performance assessment decisions of your team members are based solely on their qualifications and objective criteria.



Never:

- act in any way that may show signs of harassment, mobbing or abuse; or
- discriminate against others because of their nationality, religion, citizenship, age, sex, sexual preference, political affiliation, disability or other characteristics.

4. Sustainability and protection of the environment

At AmRest **we are committed to protecting the environment and to sustainability**. We respect existing laws, standards and environmental guidelines. All employees have the duty to take into account the environmental implications of their actions and decisions and to avoid or reduce their negative impact on the environment.

AmRest strives to apply the highest business and legal standards in the industry **uniformly across the whole organisation** and to encourage others to do the same. AmRest wants every employee, supplier and business partner to know that a responsible approach to environmental protection is an integral part of the company's sustainability strategy.

We must pay special attention to the following **environmental matters**:

- *climate change;*
- *circular economy;*
- *animal welfare; and*
- *responsible sourcing.*



5. Protection of assets and information

Protection of assets

We are responsible for safeguarding the Group's assets from **loss, damage, misuse, theft or waste**. AmRest's assets include not only facilities, equipment, supplies, materials and company funds but also any corporate intangible assets, such as sensitive information, AmRest's brand, contractual rights, etc.

As AmRest personnel, we are responsible for safeguarding the company's business assets, which shall be used exclusively in the Group's interests for appropriate business purposes and, under no circumstances, for unlawful ends.

Protection of sensitive information

Information is an asset. During your employment at AmRest you may acquire specific information about the company, products, processes, customers, suppliers or business partners that is confidential and proprietary to our brands. It is our duty to protect this information and to refrain from using or disclosing it outside the work environment.

It is imperative that each employee take appropriate measures to protect the company's secrets, which include technical, technological, trade and organisational information, as well as other information of economic value which has not been made public by AmRest.

In this regard:

- avoid discussing confidential information in places where it can be overheard by third parties, such as airports, restaurants, bars, coffee shops, elevators, toilets or on public transport;
- avoid leaving documents containing sensitive information on desks or in other places that may be accessible to unauthorised third parties (photocopiers, scanners, printers, meeting rooms, etc.), and;
- avoid disclosing confidential information to third parties outside AmRest, including any family members.

We are responsible for preserving the confidentiality of information even after the relationship of employment or cooperation with the company has ended. All confidential information must be returned immediately at the end of the employment relationship.

Since it is sometimes difficult to properly assess whether information is confidential or not, it is best to assume that revealing any internal information about the company is inappropriate.



Always:

- protect confidential information in an appropriate way in accordance with AmRest's internal regulations;
- make sure that all data is stored and deleted in a safe manner and in compliance with the appropriate legal provisions or with our Regulations; and
- share confidential information with authorised persons only, and only when it is absolutely necessary, on a "need to know" or "need to have" basis.



Never:

- reveal confidential information to competitors of our company, or discuss such information with them; or
- discuss confidential information or information that constitutes a company secret in public places.

Intellectual property

Intellectual property includes our trademarks, brands, designs, patents, trade secrets, processes and systems, and it is our responsibility to protect it.

Work or products created in connection with your duties as an AmRest employee using company resources belong to the company and cannot be used for personal gain.

At AmRest we also respect the intellectual property rights of the third parties with whom we work. We are committed to using these rights responsibly.

In particular, **the use of any content owned by a third party will require their prior authorisation.**

Protection of personal data and privacy

AmRest is committed to protecting and safeguarding the personal data of its employees, partners, customers and others with whom it cooperates, and it respects all applicable data privacy legislation in all countries in which it conducts business.

Insider trading

AmRest is listed on the stock exchanges of Madrid, Barcelona, Bilbao and Valencia in Spain, and on the Warsaw Stock Exchange in Poland. It is therefore required to disclose any information that may affect the price of its stock or influence investors' decision-making processes. We must ensure that all investors are treated fairly and have equal access to information about the company.

As part of your role at AmRest you may have access to material non-public information that might be useful for investors. "Inside Information" is defined as all information of a precise nature relating directly or indirectly to one or more marketable securities or financial instruments issued by any Group company or by issuers outside the Group, or to the issuer of such marketable securities or financial instruments, that has not been made public and that, if it were made public, could have a significant effect on the prices of marketable securities or financial instruments or on the price of related derivative financial instruments. Examples of such information include dividend changes, earnings estimates, significant merger or acquisition proposals or agreements, major litigation and liquidation problems.

It is your responsibility to keep this information confidential and to refrain from disclosing it to anyone, including family members and friends.

Trading in shares or other underlying financial instruments based on confidential information about the company (insider trading) is absolutely forbidden, contravenes various laws and may have serious consequences.

This also includes making recommendations to others (tipping) to buy or sell AmRest's shares based on information that is unavailable to the public.

If confidential information is revealed, you must inform the Investor Relations Team immediately.

Detailed rules of your obligations regarding securities trading is contained in the Internal Code of Conduct on Matters relating to the Securities Market.

External communication

At AmRest we must ensure that the information disclosed to the public is consistent and accurate. Therefore, only appointed individuals are authorised to speak on behalf of the company. You are not authorised to provide any information or statements on behalf of AmRest and if contacted by media, reporters, analysts, investors, etc., should direct the person to the appropriate communication channel - the External Communication or Investor Relations Team.

When using online communication, including social media, blogs, forums, networking sites, etc., you should state and make it clear that all material and opinions posted are your own and not the company's.

Similarly, with regard to participation in any programmes organised by mass media (TV, radio, press, internet media, etc.), you must ensure that you act in your own name and under your own responsibility. Representing the company or our brands in such programmes or commenting on company activities without the prior consent of the External Communication Team is strictly prohibited.

In all of your communications, you should also take every possible precaution to ensure that you are not disclosing any confidential information about AmRest or its employees, customers or suppliers. You must refrain from using any AmRest logos or trademarks without the express permission of the External Communication Team or Marketing Team.



Always:

- when in doubt consult the AmRest Social Media Procedure or External Communication Team;
- represent yourself as a private individual when participating in programmes organised by mass media, or when using social media or other forms of online communication; and
- obtain approval to speak on behalf of AmRest.



Never:

- speak in public on behalf of the company (including speaking "off the record") without the appropriate, explicit authorisation of the External Communication Team;
- undermine with words or actions the good name of the company, its brands, employees, suppliers or customers when participating in any mass media programmes; or
- use logos or trademarks of the company or any of its franchised brands without the consent of an authorised person (External Communication Team or Marketing Team) apart from within the area of your job responsibilities.

Using IT systems

Each of us is required to **make use of IT resources in a responsible way, appropriate** to our duties. Limited and minimum personal usage of company IT resources is permitted; however, such usage must never contravene any law or AmRest policy, or impact your work productivity. We should always protect the property of AmRest, including its IT systems, from inappropriate usage, cybersecurity threats, loss, theft and damage.



Always:

- follow the IT policies available on AmRest's Intranet;
 - make sure that equipment such as laptops, phones and other appliances is never left in public or unprotected places; and
 - protect your passwords and PINs and do not disclose them to anyone, even your family.
-



Never:

- install any non-licensed software on your computer, or download, store or forward materials that do not comply with IT policies;
 - click on untrusted links in emails; or
 - use IT resources in such a way that might contravene any law or internal policy, or that others might view as inappropriate or offensive.
-



IV. Communication and non-compliance

Whistleblowing channel – reporting complaints

Any individual or entity that becomes aware of an actual or potential breach of the law or the rules under this Code, in particular in relation to cases of fraud, corruption, accounting malpractice or any other equivalent actions that may constitute an unlawful act or breach, shall report it through the following channels:

- direct contact with the Local or Global Ethics Committee or any of their members;
- direct contact with the Compliance Team - compliance@amrest.eu; or
- online service - Speak Openly.

Any reports of infringements shall be treated in the **strictest confidence** and with **due discretion**.

Any employee that submits a report concerning possible infringements **will not be adversely affected** in any way, unless they were aware that the information was false or this may have been evident to them from the outset.

A full description of your rights and protection as a Reporting Person is contained in the Whistleblowing Group Policy.

Consequences of non-compliance with this Code

Non-compliance with the law or internal regulations, or infringement of this Code may damage AmRest's reputation. It may also give rise to the imposition of serious penalties (administrative penalties, fines or intervention in AmRest's business activities).

Breach of this Code by AmRest personnel whether intentional or due to gross negligence, may also constitute a breach of their employment contract and, accordingly, entail disciplinary measures.

The penalties imposed will be consistent with, and in proportion to, the seriousness of the infringement. In any event, non-compliance with the provisions of this Code and its implementing or complementary provisions may give rise to disciplinary penalties under the applicable collective agreement, employment legislation, Workers' Statute and all other civil and corporate obligations of the employee or executive with respect to AmRest.

Failure to comply with the provisions of this Code may result in disciplinary action in accordance with the provisions of internal regulations and applicable labour legislation in the specific country concerned.



V. Miscellaneous

- 5.1. The Code was approved by AmRest's Board of Directors on December 14th, 2021.
- 5.2. The Code is effective from February 2nd, 2022.
- 5.3. The Code is a Group Policy with the purpose and scope established in the Group Policy on Implementation of Internal Regulations.
- 5.4. This Code applies accordingly to any proposed amendments to the Regulations. Minor editorial changes, linguistic or translation corrections and obvious errors shall not require consultation or an official opinion.
- 5.5. This Code shall be made available to the Company's Personnel on AmRest's intranet.

Control of the application of the Code

The personnel shall accept its entire contents.

Any professionals hired by AmRest in the future shall have access to, and expressly accept, the Code's content.



VI. Glossary

AMREST GROUP, AMREST OR THE GROUP/WE/US – refers to AmRest Holdings and the legal entities considered to be its subsidiaries, following the definition disclosed by the Group in its consolidated financial statements.

AMREST HOLDINGS – AmRest Holdings SE with its registered office in Madrid.

BOARD OF DIRECTORS OR THE BOARD – the Board of Directors of AmRest Holdings.

BUSINESS PARTNER – individual or company that collaborates with AmRest (contractor, customer, supplier, etc.).

COMPANY – each entity belonging to the AmRest Group.

COMPANY SECRET – technical, technological, trade and organisational information, as well as other information of economic value, that is the property of the AmRest Group.

CONFIDENTIAL INFORMATION – information that is classified as confidential according to legal regulations or in an agreement executed by AmRest, and which cannot be disclosed without an authorised subject's consent and/or may only be disclosed following strict procedures. This includes information that has not been made public and is of a precise and price-setting nature, and which if made public would likely have a significant effect on the prices of the company's financial instruments.

CONFLICT OF INTEREST – circumstances known to an employee which could lead to a conflict between the interests of an employee and the Group's and employee's duties to act fairly, taking into account the company's best interests. A conflict of interest may occur when an employee has an objective reason to favour their own interests or a third party's interests over AmRest's interests.

CO-WORKER – a person who continuously collaborates with AmRest on the basis of a civil law agreement or any other similar contract.

EMPLOYEE/YOU – a natural person employed by the Company, regardless of the nature of employment or the type of contract.

GIFT – an item or other benefit of any nature (financial or otherwise).

GLOBAL ETHICS COMMITTEE – the body responsible for providing guidance and consultation on ethical standards at the AmRest Group level, consisting, among others, of representatives from Global HR, Legal, Finance, and the Internal Audit Director, Chief Risk and Compliance Officer and Global Compliance Lead, proposed by the Risk and Compliance Committee and approved by the Audit and Risk Committee. Responsible also for deciding on the necessary remedies and next steps following an Investigation into a case indicated in the Whistleblowing Group Policy.

HARASSMENT – behaviour aimed at, or resulting in, the undermining of an employee's dignity or their humiliation or the creation of a threatening, hostile, humiliating or abusive environment at work.

LOCAL ETHICS COMMITTEE – the body responsible for providing guidance and consultation on ethical standards at a regional/country level, consisting of at least three members appointed by the Global Ethics Committee and for deciding on the necessary remedies and required next steps, as a result of investigation.

MOBBING – any actions or behaviours related to an employee or directed against them which are characterised by persistent and sustained harassment or intimidation and:

- lead to a reduction in the employee's self-confidence at work;
- cause or are aimed at humiliating or ridiculing the employee, or isolating or eliminating them from the team of co-workers; or
- persistent, unjustified criticism of an employee's work, withdrawing them from their formerly assigned duties without due cause, assigning them no tasks, giving them contradictory orders, assigning them tasks below their qualifications, flooding them with new tasks to be completed by deadlines which cannot objectively be met, avoidance by the supervisor, discussing information concerning the employee's private life.

PERSONAL DATA – any information concerning an individual who is identified or possible to identify, which is subject to the personal data protection regulations laid down in the applicable law of each jurisdiction.

PERSONNEL – all employees of the AmRest Group.

REGULATIONS - a set of mandatory provisions approved according to the Group Policy on Implementation of Internal Regulations and binding on the Personnel to which they are addressed.

SEXUAL HARASSMENT IN THE WORKPLACE – any unacceptable behaviour of a sexual nature or relating to an employee's sexual orientation aimed at, or resulting in, the undermining of the employee's dignity or their humiliation.

In most cases, such harassment takes the form of:

- making suggestions;
- demanding or asking for sexual favours;
- flirting which can be abusive;
- obscene innuendos; or
- making offers (of a sexual nature).

SOCIAL MEDIA – a term which refers to using the internet or mobile technologies in such a way as to transform communication into an interactive dialogue. This includes:

- social services (e.g. Facebook, Instagram, TikTok);
- content communities (e.g. YouTube, Vimeo, Wikipedia);
- blogs and microblogs (e.g. Blip, Twitter);
- virtual world games (e.g. World of Warcraft); or
- virtual social worlds (e.g. Second Life).

VIOLENCE IN THE WORKPLACE – brutal activity in which a person uses physical or verbal force to influence their victims and submit them to their will.

