



**restaurant
brands
europe**

BURGER KING. **POPEYES.** *Tim Hortons.*

CODE OF BUSINESS CONDUCT AND ETHICS

("The Code of Ethics of RB EUROPE Group")

Version approved by the Board of Directors of Restaurant Brands
Europe, S.A.U., dated 25 February 2025

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LETTER FROM THE PRESIDENT

Dear employees, partners and franchisees:

As President of RB EUROPE, I am pleased to present our company's Code of Ethics, undertaking our commitment to honesty and good practices in our business activities.

Our aim is to reflect in this document the values inherent in the RB EUROPE Group and its companies:

- *WE OWN, we act as owners.*
- *WE CARE, we take care of ourselves, our customers, investors and the planet.*
- *WE ROCK, we live and spread the passion for our work.*
- *WE CREATE, we innovate and get ahead.*
- *WE ARE, we are authentic, genuine and transparent.*

WE UNDERSTAND THAT OUR CODE MUST REFLECT THESE VALUES AS THE ESSENCE OF THIS COMPANY and I encourage everyone to energetically convey this behaviour and to correct any conduct that deviates from this commitment.

We must be conscious of being demanding in order to carry out our work honestly and efficiently. We know what we owe to thousands of customers who place their trust in us to provide them with the highest quality service and product, and feel that they are in the best group of catering companies in the industry.

Our growth and success have been based on the principles of honesty, humility and self-improvement, which is why we must require the best behaviour based on business ethics from all the professionals who make up the companies of RB Europe Group.

At RB EUROPE we strive to lead and consolidate the QSR sector in Europe, operating restaurants, offering memorable experiences, professional development and high sustainable profitability.

This document is mandatory for all employees who are part of RB EUROPE and from whom I expect their utmost professionalism and effort to comply with it, and to respect all aspects contained herein. I also encourage you to use the channels that the company has in place to report any irregularities in behaviour that is contrary to this Code, related policies and procedures and the regulations that apply to us.

The Code of Ethics will be revised periodically to adapt to new situations within the company or changes in current laws. We rely on the professionalism of all to be aware of it, respect it and make it respected. This will avoid reputational and image risks and help our company to keep improving every day.

Gregorio Jiménez
President of Restaurant Brands Europe

1. INTRODUCTION

At Restaurant Brands Europe (hereinafter referred to as RB EUROPE or "the Company") we strive to make our venues our customers' favourite places, where employees are committed, without exception, to inclusion, respect, responsibility and the duty to do the right thing.

This code establishes the criteria for action by which the RB EUROPE Group, its professionals and all its business activities must be governed in each of the countries where we operate.

We work hard to achieve our goals. Each of us must, in our own way, build strong, lasting and trusting relationships with our customers and our colleagues. Our goal and our success are based on seeking and achieving a great relationship and understanding with those who appreciate our culture and what the brands **BURGER KING®**, **TIM HORTONS®** and **POPEYES®** stand for.

Doing the right thing means that everything we do to drive the growth and profitability of our brands is done through the **highest standards of ethics, honesty and integrity**.

Compliance with this Code of Business Conduct and Ethics, as well as with any laws or regulations that may govern the development of our business, must be kept in mind at all times.

We have a passion for brands (**BURGER KING®**, **TIM HORTONS®** and **POPEYES®**) and for serving our customers, so our products and services must always be offered with the highest quality standards as set out by our company.

2. PURPOSE

The purpose of this Code of Ethics is to establish the ethical principles that should govern the actions of the RB EUROPE Group of companies, setting out the behaviour expectations to be met by all its professionals and the stakeholders to whom the Company is related.

The Company is part of RESTAURANT BRANDS INTERNATIONAL, which has its own Code of Ethics, but, without prejudice to this, RB EUROPE has deemed it necessary to have its own code, including the particularities of its business, based on the international standards of conduct as set out in the **General Code of Conduct of RESTAURANT BRANDS INTERNATIONAL**.

However, it should not be forgotten that the principles and standards set out in this document are of a general nature, and will therefore be subject to more specific development in those areas in which it is considered necessary through the internal regulations established in the company ("the Regulations"), and each Group company may have its own.

3. SCOPE OF APPLICATION

The RB EUROPE Company represents the **BURGER KING®**, **TIMHORTONS®** and **POPEYES®** brands for Spain, Portugal, Andorra and Gibraltar. And Popeyes in Italy.

In this regard, this Code is mandatory and applicable:

- To all the companies comprising RB EUROPE, located in Spain, Portugal, Andorra, Gibraltar and Italy.
- All employees of the companies comprising the Group, regardless of the duties or position they represent or hold.
- To the franchisees and employees of the various franchise companies.

This document shall also apply to the following natural or legal persons, as appropriate:

- Employees of RB EUROPE Group, irrespective of the type of employment relationship, position held or geographical area where they work.
- Members of the governing body of RB EUROPE, whatever the composition, form and mode of operation of the body.
- Customers, suppliers, shareholders, franchisees and other stakeholders.

4. MANDATORY COMPLIANCE

With respect to this Code of Business Conduct and Ethics, all employees are subject to the following obligations:

- Being familiar with the Code of Ethics and acting at all times in accordance with its contents.
- Reporting through the Whistleblowing Channel and other channels provided by the Company any indications of situations that contravene the provisions of this Code.
- Failure to comply with this Code may lead to disciplinary action, including the possibility of termination of your employment with RB EUROPE or group company and, if appropriate, legal action.

All managers and department leaders have the following obligations with respect to this Code:

- Communicating it to their work teams.
- Leading compliance through their example.
- Resolving and supporting their teams in the different ethical dilemmas that may arise in each situation.
- Correcting deviations detected in compliance with the Code.
- Reporting any actions contrary to the provisions of this Code to the Company's Ethics and Compliance Department.

The government bodies of RB EUROPE, as well as of the various Group companies, are committed to the highest standards of ethical behaviour, being the Principle of Compliance with the Law the first of the principles that must govern this Code of Business Conduct and Ethics.

No addressee of the Code (whether the relevant person or entity is subject to it or not), regardless of their position or office, is authorised to request anyone else to contravene the provisions of the Code. No person or entity subject to this Code may justify conduct that violates it on the grounds of an order from a manager or ignorance of the Code.

5. VISION, MISSION AND VALUES OF RB EUROPE GROUP

The Company has defined its business vision through what it does (Mission) and how it does it (Values), which in turn serves as a reference for this Code of Business Conduct and Ethics. Thus we have:

5.1. RB EUROPE'S VISION

We lead and consolidate the *Quick Service Restaurants* (QSR) industry in Europe, operating restaurants, offering memorable experiences, professional development and high sustainable profitability.

5.2. RB EUROPE'S MISSION

We operate QSR restaurants to serve you with good products, full of flavour and made on the spot, for everyone, whenever you want, the way you want.

5.3. RB EUROPE'S VALUES (#TheRBEWay)

- **WE OWN.** We act as owners.
- **WE CARE.** We take care of ourselves, our customers, investors and the planet.
- **WE ROCK.** We live and spread the passion for our work.
- **WE CREATE.** We innovate and get ahead.
- **WE ARE.** We are authentic, genuine and transparent.

6. ETHICAL PRINCIPLES

This Code is based on ethical principles, including the following:

- **Transparency:** This is essential to reassure and maintain our various stakeholders' confidence by improving the information and communication of the results of our activities.
- **Integrity:** To behave in an exemplary and upright manner, acting responsibly and in good faith.
- **Lawfulness:** Compliance with all applicable laws and regulations in the development of its business, through the implementation of policies and procedures that ensure their performance.
- **Equality:** Respect among colleagues, suppliers, customers and any other person, with no room for discriminatory attitudes of any kind.

- **Morality:** To avoid causing damage to the Company through commission or other unlawful activities that damage its image and/or reputation.
- **Professionalism:** To conduct the activities of the business with as much interest and employment support as possible.
- **Corporate Responsibility:** Just as professionalism is a non-negotiable, employees must respect the working environment and the group of companies that are part of RB EUROPE, in order to contribute to its improvement and progress.

Ensuring compliance with the above fundamental ethical principles requires not only responsible conduct on the part of any addressee of this Code, but also a responsible attitude, with the identification, reporting and resolution of ethically questionable situations.

7. HOW DO I KNOW IF I AM DOING THE RIGHT THING?

As stated at the beginning of this Code of Conduct, it is not possible to describe all the situations that may arise, and for this reason, in order to know whether you are acting ethically, you should ask yourself the following questions when faced with any doubt or situation:

- Is it legal?
- Is it the right thing to do?
- Is it in line with the Code of Conduct?
- Am I following the policies and manuals established by the company?
- Is a good example being set?
- Is ethical behaviour being displayed?
- Can other people be involved?
- Can it have a negative impact on me or on the reputation of the companies or brands?

If you have reasonable doubts in any of the above situations, please send your questions to the e-mail address available for this purpose, which must be provided by the Compliance Department.

8. RB EUROPE'S COMMITMENT

The Company expresses its commitment to integrity, transparency, legal compliance and stakeholder relations as follows:

8.1. TO THE STANDARDS

- A prerequisite for employment with our Group companies is knowledge of and commitment to compliance with the provisions of this Code, as well as all policies, procedures and other internal controls adopted within our organisation.

While this Code and our policies cover most of the situations that we may face in our day-to-day work at RB EUROPE, there will undoubtedly be circumstances that need to be dealt with on an individual basis.

- In the event that you are involved in a situation not foreseen in this Code and you have doubts as to how to respond to such a situation, please, contact your direct supervisor, the Human Resources area, the Compliance Officer or raise the query through the channels that the Company has in place.
- RB EUROPE must take the necessary action to give effect to the set of values, principles and rules that comprise this Code by disseminating its contents in all areas of the organisation.

8.2. TO EMPLOYEES

Together with the brands **BURGER KING®**, **TIM HORTONS®** and **POPEYES®**, the human team that makes up our organisation constitutes the main asset of our Company, since without them it would not be possible to achieve the Group's objectives.

All of us who are part of this organisation must contribute to the achievement of its Mission, through behaviour based on our shared values.

The RB EUROPE Group is committed to training employees to help them grow not only professionally, but also personally, by instilling in them the ethical principles on which this Code is based.

Commitment to our people also means creating places where they love to come to work every day, where the motivation to provide a high quality, high value service to our customers is their primary focus.

a. Inclusion, Diversity, Respect and Human Rights

- All management processes in the Human Resources area are based on respect for the dignity and rights of people.
- RB EUROPE Group is committed to creating and maintaining a positive working environment, free from discrimination, harassment and retaliation.
- Our organisation does not accept any kind of discriminatory behaviour based on race, ethnicity, gender, religion, sexual orientation, trade union membership, political beliefs, family status or disability, nor any kind of verbal or physical harassment based on the above or for any other reason, nor will it be accepted in relationships within the company, in its organisational decisions, or in its relationship with customers, franchisees, suppliers or third parties.
- Abuse of authority and any offensive or intimidating behaviour is prohibited within RB EUROPE Group. Especially sexual and moral harassment.

"As a company, we condemn the use of authority for any purpose other than strictly work-related".

- RB EUROPE Group recognises that Human Rights are fundamental and universal rights and must be interpreted and recognised in accordance with international law and practice, and in particular in relation to the provisions of the United Nations Universal Declaration of Human Rights and the principles proclaimed by the International Labour Organisation.

b. Occupational Health and Safety

- Our organisation has a firm and permanent commitment to health and safety at work, being an essential value in the development of all our activities.
- RB EUROPE Group has the means to ensure a safe, stable and healthy working environment for its employees, suppliers, franchisees, customers and, in general, any partner, with an *Occupational Health and Safety Management System* that is updated on a regular basis.
- The Occupational Health and Safety Management System foresees the implementation of permanent training and information activities, so that employees have the necessary knowledge about the risks inherent in the development of their activity.
- All our employees are committed to and take responsibility for strict compliance with occupational health and safety standards in the performance of their duties, ensuring their own safety and that of those around them.
- The prevention of accidents at work and occupational diseases is everyone's job, which is why employees of the companies belonging to the group must:
 - Know and comply with protection and safety standards,
 - Report any anomaly you find in our Occupational Health and Safety Management System to the line manager or the person in charge of the health and safety department.
 - Require the use of the means of prevention and protection and participate in training courses on occupational hazards.

c. Professional Development

- RB EUROPE Group will support the personal and professional growth of its employees, encouraging the improvement of their own abilities and skills.
- All our processes and policies relating to recruitment, hiring, training and promotion must be conducted on the basis of equal opportunity and non-discrimination, impartiality and confidentiality, and will be based on clear criteria of ability, skills and professional accomplishments.

d. Prohibition of Alcohol and Drug Use

- RB Europe prohibits the consumption of alcoholic beverages and drugs during working hours and at workplaces, as their ingestion may be detrimental to safety, productivity and the maintenance of professionalism and responsibility of employees.

8.3. TO CUSTOMERS

- RB EUROPE Group considers customer satisfaction as a priority.
- Efficiency in processes, transparency and integrity in action and treatment are promoted, guaranteeing the quality of customer service as the main objective of all the professionals who comprise our organisation.
- Our customer relationships must always be governed by the principles of integrity and honesty.
- RB EUROPE Group undertakes the obligation to be honest with its customers, suppliers, franchisees, stakeholders and third parties in general, always providing them with truthful, clear, useful and accurate information when marketing its products.
- We will use our best efforts to avoid the use in advertising or marketing of arguments that are far from the reality of the product offered, or that refer to fake or non-existent characteristics of the product.
- The companies of the RB EUROPE Group must at all times check that their products comply with all required and advertised specifications and must make every effort to ensure that the services and products offered are free from health hazards.
- All our products are devised, produced and served in compliance with consumer protection, health and food safety standards.
- All testing, product inspections and other product-related aspects are accurate, complete and timely.
- Our employees must handle food in accordance with established food handling policies.

8.4. TO SUPPLIERS

- RB EUROPE Group must always deal ethically and lawfully with suppliers of goods and service providers.
- All suppliers must operate in compliance with current regulations and are responsible for ensuring that subcontractors comply with the standards set out in this document and within the relevant legal framework.
- Due diligence and care shall be used in the supplier evaluation and selection processes in order to avoid any business relationship with individuals or legal entities that may be

involved in unethical or dishonest conduct or behaviour, and in particular, in activities related to criminal offences.

- RB EUROPE Group reserves the right to terminate its contractual relationship with suppliers who are in breach of the Code and related policies and may claim damages from them.
- Suppliers of the RB EUROPE Group must respect compliance with internationally recognised Human Rights and ensure that they do not defraud or abuse these rights in their business operations.
- Suppliers must maintain a focus on environmental protection, and encourage the development of environmentally friendly technologies.

8.5. TO SHAREHOLDERS

- Shareholders are one of the Company's main stakeholders, with whom we develop a relationship based on sustainable mutual benefit and governed by the principles of trust, transparency and ethics.
- To this end, RB EUROPE Group is committed to provide all relevant information to shareholders.

a. Corporate Governance Rules

- RB EUROPE and its Group companies are committed to managing the companies in accordance with the highest ethical standards and best practices in Corporate Governance.

b. Risk Control and Management

- RB EUROPE Group must establish appropriate controls to regularly assess and manage risks to the business, people and reputation of the companies.

8.6. TO THE FIGHT AGAINST CORRUPTION

- The Company is firmly committed to the fight against corruption, in all its forms and in every country where we operate.
- Furthermore, RB EUROPE Group is committed to compliance with applicable laws and regulations and the highest ethical standards in its business activities and stakeholder relationships.

This commitment is implemented as follows:

a. Bribery, Corruption, Kickbacks and Influence Peddling

- RB EUROPE Group completely prohibits any kind of bribery or payment of kickbacks in any form whatsoever to authorities, public officials, officers or employees belonging

to companies or public bodies at national or international level, as well as any third party with whom the company has any kind of relationship, whether a public body or an individual, in order to obtain any benefit for any of the companies or for itself.

Q.- *Our promotion is ready but the gift toys are held up in Customs. Can I pay a small gratuity to the customs inspector to speed up the process?*

A.- *The company does not allow a gratuity to be given to government officials to guarantee the performance of their official duties.*

- It is strictly forbidden to make, promise or offer any kind of payment to authorities, public officials or officers or employees belonging to public or private companies or bodies at national or international level, whether directly, indirectly through agents, intermediaries, advisors or any other persons.
- It is not permitted to obtain undue advantage by using personal relationships with public authorities, public officials or any other private individual or entity.
- RB EUROPE Group requires all decisions taken by those employees who have any kind of relationship with national and international public administrations to be made in strict compliance with the laws and regulations.

Shortcuts shall not be tolerated when it comes to ethics.

b. Acceptance of Gifts and Compensation

- Employees are prohibited from giving or accepting gifts, presents, entertainment or favours in the course of their work.
- Exceptionally, the giving or receiving of gifts and presents shall be permitted, provided that they are not prohibited by law, correspond to normal and customary (generally accepted) business practices or signs of courtesy, are in any case of symbolic or irrelevant economic value, and are not intended to influence the objectivity and independence that should govern the conduct of all our activities.
- Attendance at any type of event in which a third party pays all or part of the costs of accommodation and travel must be subject to approval by the Compliance Officer.
- If you receive offers of any kind that could involve an attempt by the offeror to obtain any kind of compensation in their relations with our organisation, you must bring this to the attention of your Compliance Officer.

C. Conflict of Interest

- A conflict of interest occurs when an employee's personal interests or the interests of a third party compete with the interests of the Company. In this situation, it may be difficult to act in the best interests of the RB EUROPE Group.

- Being responsible means making smart decisions and remembering your duty of loyalty to the Company. A breach of this duty occurs if you engage in activities that conflict with the interests of the company.
- Conflicts of interest can take many forms and it is not possible to mention or capture all of them in this Code.

Examples of conflicts of interest to avoid include:

- **Engaging in any activity that conflicts with the companies' business**, such as: working as a consultant or in any capacity for another fast-food restaurant company.
- **Having an ownership interest or other business relationship with a competitor**, supplier, franchisee or distributor of the company.
- **Conducting any company business with or on behalf of a family member**, including business with any franchised supplier or distributor of the Company.
- Whenever possible, employees should avoid Conflicts of Interest.
- If a conflict of interest has arisen or if you are faced with a situation that may involve or give rise to a conflict of interest, you must disclose it to your line manager, the Head of Human Resources, or the Compliance Officer in order to resolve the situation in a fair and transparent manner.

Q.- I would like to hire my brother-in-law's company to do work for the Company. I don't think it's a problem if it offers the best price. Do I have to tell my supervisor that I am related to the owner?

A.- Yes, because there is a potential conflict of interest if a relative owns or works for a supplier with which the Company does business. Your supervisor will review the situation with the Compliance Officer to determine the steps to be taken to address the potential conflict.

8.7. TO PROTECTION OF COMPETITION

- RB EUROPE Group shall not act unfairly towards competitors by taking advantage of confidential information that it may obtain through unlawful channels and shall at all times ensure free market competition.
- We achieve our goals through our own accomplishments, never through unethical or unlawful business practices, or contrary to antitrust laws (price agreements, market division, limiting competition, etc.).

8.8. TO FINANCIAL INTEGRITY AND THE PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

a. Recording and Preparation of Financial Information. Accounting and tax obligations

- RB EUROPE Group must ensure that financial and accounting records are prepared reliably and accurately, working with the internal control area, external auditors and competent authorities as necessary.
- The Group Companies have implemented specific procedures to ensure that the financial statements have been prepared in accordance with the applicable accounting principles and measurement standards and transactions.
- Persons responsible for the incorporation of data in the different types of records, processed and used by companies in the process of preparing their financial information, must ensure that they are reliable, complete, accurate and up to date.
- The financial statements and other accounting documents shall properly show the financial position and the actual assets and liabilities of the Companies.
- All employees and especially the Finance and Accounting Department should pay particular attention to the following points:
 - No transactions shall be entered into for the purpose of tax avoidance or misrepresentation in accounting or financial information.
 - The keeping of a record of transactions on off-balance-sheet media not recorded in the official books is prohibited.
 - No non-existent expenses, income, assets or liabilities shall be recorded.
 - No entries shall be made in the accounting books which incorrectly state the purpose of the entry.
 - Particular attention shall be paid to the preservation of all documents for the period of time provided by law.
 - Prudent use shall be made of the Companies' assets and care shall be taken to ensure that their assets are not subject to loss or impairment.
- Payments and collections made by the Company shall be in accordance with the cash and bank collection and payment rules as set out in the organisation's policies.
- No cash collections or payments may be made, except in the case of small amounts and in accordance with the cash and bank regulations.
- Payments shall be duly supported by invoices, contracts, delivery notes and all other documents and procedures laid down in the collections and payments and cash and bank regulations.
- The issuance of bearer cheques is expressly prohibited except in exceptional cases and with the authorisation of the Compliance Officer.

b. Prevention of Money Laundering and Terrorist Financing

- You must pay particular attention to cases where there are indications of the lack of integrity of the natural persons or legal entities with whom they contract, in order to avoid and prevent involvement in potential money laundering operations from criminal or unlawful activities.
- You should also review carefully:
 - Cash payments which seem unusual in view of the nature of the transaction.
 - Payments made by bearer cheque.
 - Payments made in currencies other than those previously agreed.
- If an irregular situation is detected, you should report it as soon as possible through the channels established in this Code.

8.9. TO THE PROTECTION OF CONFIDENTIAL INFORMATION, INTELLECTUAL PROPERTY AND INDUSTRIAL PROPERTY

a. Protection of Confidential Information

- All employees of RB EUROPE and Group companies shall maintain the strictest professional secrecy and confidentiality with respect to all information they use and to which they have access in the course of their duties.
- Special care and protection must be taken with respect to the disclosure of such confidential information, including, but not limited to:
 - Information related to business plans,
 - Products or services,
 - Financial forecasting and budgeting,
 - Patents and trademarks,
 - Utility models or any property rights,
 - Computer passwords,
 - Inventions and processes,
 - Designs and advertising,
 - Management techniques, etc.
- Employees may not access, use or disclose confidential information unless they have been authorised to do so.
- Particular care should be taken to avoid inadvertent disclosure of this type of information in day-to-day business transactions and in conversations with friends and family.
- Responsibility for the protection of confidential information is a legal obligation that continues even after leaving the company.
- No employee of the RB EUROPE Group should accept confidential or proprietary information about a third party, its products or business, including that of a competitor, without the prior authorisation of the company's Legal Department, regardless of the

source of the information (owner, employee, former employee or franchisee of another chain, etc.).

b. Intellectual Property and Industrial Property

- RB EUROPE Group and its employees shall maintain special care and commitment to the protection of its own and others' intellectual and industrial property rights, including, but not limited to:
 - Patent rights, trademarks;
 - Domain names;
 - Projects;
 - Programmes;
 - Databases and computer systems;
 - Knowledge;
 - Processes;
 - Technology;
 - Know-how;
 - Equipment;
 - Manuals;
 - Videos; or
 - Rights on specialised know-how.
- You must respect the intellectual and industrial property rights of the companies, and use them exclusively when performing your activity in the company, and must proceed to the return of all materials on which such rights are supported as soon as they are requested.
- Intellectual and industrial property rights held by third parties outside the RB EUROPE Group must also be respected.

8.10. TO PERSONAL DATA PROTECTION

- RB EUROPE and its Group companies must ensure the protection of personal data processed in the course of their activities, in compliance with the applicable data protection regulations.
- The Company must adopt specific technical and organisational security measures to ensure the adequate safeguarding of personal information.
- All employees of RB EUROPE and its Group companies must always respect the specific security measures on personal data protection when dealing with personal data of customers, suppliers, shareholders, colleagues or any other person with whom they interact.
- RB EUROPE Group will adopt training and dissemination policies for its employees, thus avoiding any type of non-compliance in this area.

8.11. TO THE PROPER USE OF IT SYSTEMS AND EQUIPMENT

- The Company's IT systems are managed by the leader of the IT department.
- Employees of RB EUROPE and its group companies must use the IT systems and resources made available to them in compliance with the policy on the use of technological means and in any case with the internal guidelines or rules for their use.
- You must be aware of the following:
 - IT tools (e-mail, internet, intranet, telephone, fax, etc.) must be used in conditions appropriate to the performance of the job and its duties.
 - They must not be used in an abusive manner, nor for your own benefit or for actions that could affect the reputation or image of the companies or the brands you represent.
 - You are not permitted to store your personal data on company-provided computers or any other device.
 - The software to be used on computers and computer systems is exclusively that installed by the relevant IT department.
 - You may only have access to computer systems for which you are authorised and with the appropriate licences.
 - Internet access and corporate e-mail are provided as work tools and therefore only professional use is allowed.
 - Communications that may be made through IT tools must not contain offensive or defamatory statements.
 - The dissemination or transmission of illegal, sexist, abusive, obscene, defamatory, racist, pornographic or any other type of offensive information or information not authorised by law, in any medium (photographs, texts, links to external pages, etc.) is prohibited.
 - The publication, transmission, reproduction, distribution or exploitation of any information, pirated material or software containing viruses or any other component harmful to the integrity of IT systems or which may be contrary to intellectual property rights is also prohibited.

8.12. TO THE BRAND

- One of the main, if not the most important and valuable asset of RB EUROPE Group is its brands: **BURGER KING®**, **TIM HORTONS®** and **POPEYES®**.
- Through the brands we not only distinguish ourselves from our competitors, but also represent our prestige and reputation that we have achieved by providing our services with the highest quality standards.
- For this reason, all our officers and employees must ensure that the brands are protected at all times.

8.13. TO FRANCHISEES

- Many of our brands' restaurants operating in Spain, Andorra, Gibraltar and Portugal are company-owned and others are operated by entrepreneurs and shareholders independent of our company.
- Both our own venues and the rest of the franchisees are part of the plan to achieve our common goals. The company must not forget that all franchisees are an important part of our success.
- Trust and respect between all parties is the cornerstone for moving in the same direction. By sharing a common vision with the other franchisees and by treating each other fairly and with respect, we grow together.
- Some of our brands are responsible in each case for managing the marketing fund, which is made up of contributions from franchisees. We therefore feel responsible and are committed to managing it in an efficient and transparent manner, complying at all times with the laws and ethical and moral principles that govern our brands, as well as establishing the necessary control measures for the fulfilment of our commitment.
- In all negotiations and relations of the brands with their franchisees, they shall act in accordance with the applicable legal regulations, as well as with the procedures and policies established by each of the brands that comprise RB EUROPE Group, or any future procedures or policies as communicated and always with respect for the ethical principles set out in this Code.

8.14. TO SUSTAINABILITY AND ENVIRONMENTAL PROTECTION

- RB EUROPE Group is committed to caring for and respecting the environment in the course of its activities.
- This requires the maximum involvement of all addressees of the Code by seeking and implementing the efficiency of the equipment used, the energy consumed and the way in which waste is disposed of, always aiming for the highest standards of sustainability.
- Our commitment is focused on ensuring the delivery of our service and our products while respecting our environment.
- To this end, RB EUROPE Group carries out its activities with a firm commitment to preserving and respecting the environment, on the basis of the following principles:
 - Reducing the generation of waste, managing it properly and encouraging its reuse.
 - Training and informing staff on environmental issues.
 - Accepting environmentally friendly alternatives from suppliers.

- Contributing to the preservation of natural resources, which will in any case be consumed with criteria of reasonableness, efficiency and savings.
- Planning the processes and developing the construction and opening works of new premises, adopting all necessary measures to prevent and, where appropriate, minimise the possible environmental impact as much as possible.

9. ETHICS CHANNEL

The various brands belonging to RB EUROPE Group have a Whistleblowing Channel, also known as Ethics Channel, which ensures that any employee, franchisee, supplier, customer or third party, who becomes aware of a breach of the Code, of the applicable Regulations or of any unlawful act, may report it confidentially with full guarantees of protection and confidentiality and without fear of retaliation.

This Channel is available 24 hours a day, every day of the year, in the local language of the countries where the Company operates and can be accessed at the corporate website of the Restaurant Brands Europe S.A.U. Group (<https://www.rbeurope.com/>) and at the following link: <https://rbeurope-canaletico.appcore.es/>

In the event that you honestly and in good faith report behaviour contrary to the Code of Conduct, you will be supported by the Company.

With regard to the recording and management of communications received through the Whistleblowing Channel:

- In no case shall communications be required to go through the line manager of the person making them.
- All investigations initiated will be handled, in compliance with the Code of Conduct, according to legal requirements and in accordance with the employee's Human and Employment Rights.
- In no event will any retaliation of any kind be tolerated against an employee for making a report of an alleged breach of the Code or applicable regulations.
- The Whistleblowing Channel does not cover false or manifestly unfounded reports. Therefore, where there is evidence that the false report has been made in bad faith, the Human Resources division will take the disciplinary measures it deems convenient and appropriate, and such report may be considered serious misconduct and may even lead to the termination of employment.
- The steps to be followed for reporting and managing reports governed the Ethics Channel are regulated in the internal policy and procedures established for this purpose.

10. VERSION CONTROL

Version	Summary	Drafted by	Approved by	Date
7	Update	Compliance	Board of Directors	01/12/2018
8	Revision and update	Compliance	Board of Directors of Restaurant Brands EUROPE, S.A.U.	25/05/2022
9	Update	Compliance	Board of Directors of Restaurant Brands EUROPE, S.A.U.	18/04/2023
10	Update	Compliance	Board of Directors of Restaurant Brands Europe, S.A.U.	25/02/2025



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BURGER KING

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Tim Hortons

CONTACT:

Restaurant Brands Europe Group

Avenida de Europa 26, Edificio Ática 7,
C.P. 28224 - Pozuelo de Alarcón, Madrid (Spain)
Tel.: (+34) 91 450 16 26

Ethics Channel: <https://rbeurope-canaletico.appcore.es/>

Corporate Website: <https://www.rbeurope.com/>