

CLEAR DESK POLICY AT FERTIBERIA, S.A. AND GROUP COMPANIES



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SCOPE OF APPLICATION

FERTIBERIA's Clear Desk Policy forms an important part of the Company's Data Protection Policy and comes in response to another good business practice goal taken on by the Company in its Code of Ethics, all within the framework of its commitment to achieving the highest standards of corporate governance.

The policy applies to Fertiberia and to all entities belonging to its business group, and sets out the conduct that is expected of all employees, middle managers, technicians and senior managers at all companies in the performance of the professional tasks entrusted to them, both at their workstations in their respective workplaces and when it is necessary to work from home due to circumstances determined by the Company and/or group companies.

This Clear Desk Policy not only refers to documentation in paper format, but also applies to any other electronic and digital devices that contain and/or may store information belonging to the Company and/or companies in its group, either currently existing or which may exist in the future.

This Clear Desk Policy is organised around the following **essential commitments**:

- ✓ **Do not store documents on desks or workstations.**
- ✓ **Store away any documentation in a suitable manner.**
- ✓ **Monitor how confidential documentation is processed.**
- ✓ **Employee training and adoption of measures to ensure compliance.**

This policy outlines the principles and actions applied by FERTIBERIA, without prejudice to the applicable provisions in Spanish and/or European regulations.

All employees are given internal protocols and guidelines, in addition to any training and support documentation needed to act in accordance with this Clear Desk Policy for FERTIBERIA and group companies.

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1 DO NOT STORE DOCUMENTS ON DESKS OR WORKSTATIONS.

A series of mandatory measures have been established for all Fertiberia employees and those of its group companies, aimed at clearly, simply, practically and efficiently preventing any documentation from being stored on desks or workstations.

Consequently, all Fertiberia employees and those of its group companies must:

- ✓ Properly gather all documentation once it is no longer being used.
- ✓ Limit the printing of any documents that are not necessary and check that there are no printed documents left in the output tray containing data classified as sensitive.
- ✓ Use paper shredders as and when required according to the content of the information.
- ✓ Lock/shut down any devices when not in use for whatever reason.
- ✓ Ensure and verify that any work material and documentation is properly stored away at the end of the working day, with the relevant protection measures—depending on the type of documentation in question—if necessary, under lock and key and in the location established for this purpose.
- ✓ Keep any item that may provide access to documents (such as keys and/or passwords) as safe as possible.

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2 STORE AWAY ANY DOCUMENTATION IN A SUITABLE MANNER.

In order to ensure the proper safekeeping of company documentation, all Fertiberia employees and those of its group companies must:

- ✓ Store documentation on suitable media.
- ✓ Store these media in an appropriate manner and, if required by the content of the documentation to be filed away—due to its confidential nature—in suitable office furniture.
- ✓ Adopt any security measures required in order to ensure the documentation is securely stored.

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3 MONITOR HOW CONFIDENTIAL INFORMATION IS PROCESSED

Fertiberia and its group companies adopt effective measures to monitor how confidential documentation is processed:

- ✓ Guaranteeing the minimum required access to confidential documentation: only those persons who require access to confidential documentation for the correct performance of their professional duties shall have such.
- ✓ Signing confidentiality agreements—of an internal nature— with those who have access to confidential documentation.
- ✓ Signing confidentiality agreements with third parties when it is necessary to exchange confidential and/or sensitive documentation in order to analyse potential structural, commercial or industrial operations, or those of any other kind.
- ✓ Discouraging note-taking on sensitive data in places or on items that may be vulnerable or easily disposable.

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4 EMPLOYEE TRAINING AND DISCIPLINARY ACTION

Fertiberia and its group companies ensure compliance with the measures set out in this Clear Desk Policy, through the Personal Data Protection Policy, and to this end:

- ✓ Fertiberia and its group companies undertake to raise awareness among employees by implementing a system of continuous training and regular audits on Personal Data Protection, which will include a specific section on this Clear Desk Policy, and thus be able to jointly ensure that confidential documentation is not shared or disclosed to any unauthorised persons.
- ✓ Furthermore, if any irregularity or non-compliance is detected, Fertiberia and/or its group companies shall adopt the disciplinary measures they consider necessary and proportionate.