



CODE OF ETHICS

FRUTAS ESTHER, SA, O.P.F.H

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Important information about this document

Policy Identification	CODE OF ETHICS
Scope of application	Global
Personnel involved	All organization members and its subsidiary companies
Main monitoring responsible person	Social Responsibility and Ethics Committee

LETTER FROM THE MANAGING DIRECTOR

Dear FRUTAS ESTHER member:

Respecting and enforcing the values that make up this Code of Ethics is crucial for the growth and success of FRUTAS ESTHER. We pursue the creation of long-term value and the consolidation of FRUTAS ESTHER as a benchmark leading company in the sector in which we operate, maintaining a firm and constant commitment to the well-being and development of all of us and to society in general. From the very beginning we have carried out our daily activity by scrupulously complying with our values, ensuring in this way that our reputation and public image are one of our most important assets.

This Code of Ethics has been formulated with the purpose of unifying and reinforcing FRUTAS ESTHER's identity and conduct guidelines. We are committed to the principles of business ethics and transparency in all our areas of action. Therefore, we must respect and apply this Code, as well as the regulations applicable to us.

However, it is also true that, at any time, an isolated and specific behavior by just one of us can irretrievably damage something that has cost us so many years to build: the fact that FRUTAS ESTHER is considered as an exemplary and model Company, respectful of Law and of our environment. Therefore, we must all comply with the values set-up in this Code of Ethics and use the Ethics Channel made available to us by FRUTAS ESTHER to report the irregularities and inappropriate behaviors we could observe.

In this regard, it must be noted that this Code of Ethics intends to respond to the main contingencies and situations we could face as members of FRUTAS ESTHER. However, it does not include all of them. It constitutes a tool to guide and direct our actions on those issues that are of particular importance for our Company and for all of us. Respecting the provisions of this Code helps us progress and grow.

It concerns us all. Our reputation and our future as a benchmark company depend on us all continuing to behave in an honest, upright and transparent manner; every day and in all our activities. We are confident that we will continue doing so.

Esther Gómez
General Director

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1. Introduction

We are a team of qualified professionals who develop a common project and understand that the culture of compliance is not an activity added to the business or communication management of FRUTAS ESTHER (hereinafter, the Company), but it is an integral part of its management philosophy, based on the socially responsible behavior at the workplace. The purpose of promoting a culture of compliance is not based solely on a set of activities planned by the Company to “return part of the benefit to society” or to “socially position”, but the ethical commitment at the corporate level is based on developing the business in a socially responsible way. To this aim, we base our ethical commitment through the following pillars:

- **Corporate Ethics.** We maintain and support a corporate ethics policy based on commitments, strategies and operational practices for the development, evaluation and control of behaviors based on ethics and integrity in corporate relationships.
- **Social responsibility and the need for an informed decision-making.** We make decisions in accordance with the ethical principles that govern the respect for human beings, public health and the environment. For this reason, we have a team of collaborators who have the capacity and willingness to account for their actions.

Involvement and commitment. We are committed to gaining market share and maintaining our customers trust through continuous improvement and ensuring compliance with the highest standards in food quality and safety. We strive to do not only what is legal, but also what is right.

2. Objective and Scope of application

2.1 Objective

This Code aims to collect the principles and values that inspire our behavior in the relationships we maintain with third parties and among ourselves.

Actually, this Code reflects our commitment to transparency and integrity in the development of our professional activity and aims to provide a framework of reference when developing the tasks entrusted to each of us.

Consequently, this Code provides common principles of action that also serve as a basis for the rest of the policies and procedures implemented, being the core of the internal regulatory system. In this way, any internal policy or procedure shall be interpreted in accordance with the spirit of this Code.

2.2 Scope of application

This Code applies to all senior managers, employees and collaborators who are part of the Company, both present and future, regardless of their hierarchical position and operational or geographical location, as well as to the members of the Company's Board of Directors. Hence, to all the personnel who work or act in their name and on their behalf, regardless of their hierarchical level, type of contract, geographical location and similar issues.

All of them, hereinafter, jointly or individually referred to as the “**personnel**” or the “**employees**”.



Likewise, the principles and values are applicable to suppliers, independent contractors’ employees, intermediary agents, outsourced companies and all those people who, without being employees, act on our behalf.

We are committed to disseminating and spreading this Code to the greatest possible extent in order to guarantee that all of us have full knowledge thereof. In this sense, those senior officers or managers

who, in the performance of their duties, manage or direct teams, must be an ethical reference for them and ensure that people under their supervision, as well as third parties acting on behalf of the Company know and comply with its contents.

3. Mission, visión and purpose

Our values must guide our behavior, in the relationships inside and outside the Company, with related institutions, customers and the environment.

Said values are grounded on what we are today in our relations with our customers, our suppliers, all those who interact with us in the market and even with ourselves; in short, the entire value chain of our activity.

The values that represent us cannot be understood if we do not start from what we are today (Mission) and what we want to be in the future (Vision).

Therefore, we apply ethical behavior standards and continuously promote the development of our professional activities by complying with a series of principles based on **transparency, honesty and equality**.

3.1 Misision

We aim to satisfy the needs of our customers by ensuring the quality, safety and compliance with regulatory requirements of our products.

We are committed to innovation and strive for maintaining the Company in a prominent leadership position in the production and export of stone fruit.

We develop our activities in strict and faithful compliance with current legislation and applying social responsibility criteria, with the aim to achieving excellence in the products we offer.

3.2 Vision

To continue being a leading and benchmark company in the sector, offering only those products that guarantee the highest standards of quality and food safety and of respect and sustainability with the environment.

3.3 Purpose

This Code, in addition to collecting the values that govern our daily activity, responds to the obligations related to criminal prevention issues imposed in the field of criminal liability of legal entities, being an essential element of the Criminal Risk Prevention Model adopted by the Company.

In this sense, although this Code does not contemplate all the hypotheses or situations that could arise in the reality of our daily lives, it does constitute an accessible reference tool, which marks the path to be followed as a guide for our actions in issues related to social order, business responsibility and in general, in ethics, integrity and legal compliance matters.

Based on the above, we must know and comply with both the spirit and the meaning of this Code, which constitutes the fundamental basis of the Company's good governance and corporate responsibility policies, its supervision being the responsibility of the Board of Directors and its management bodies, through the Social Responsibility and Ethics Committee (SR&E Committee) of the Company.

4. Our values

Values are key to defining the compliance culture at the Company and must guide all areas of our business activity.

4.1 Legal and Regulatory Compliance

We develop our business and professional activities in accordance with current legislation, taking into account the spirit, purpose and wording of the standards. Likewise, we fully respect the commitments and obligations undertaken by the Company as is customary and usual in those countries in which we carry out our activity, as well as in the contractual relationships established with third parties.

Senior Managers, within the framework of their functions, must particularly know the laws and other regulations impacting their respective areas of activity. Likewise, they must ensure that the professionals depending thereon receive the necessary information and training that allows them to understand and comply with the legal obligations applicable to their functions.

On the other hand, we are committed to complying with and enforcing the principle of contractual good faith that must govern when contracting with any third party. In this regard, we undertake to fully respect in good faith the obligations and commitments undertaken in the contractual relationships we enter into with third parties.

By virtue of the above, we intend to guarantee that we initiate and establish commercial, professional and/or employment relationships only with companies and people in a good standing position.

4.2 Integrity

Integrity, understood as honesty and good professional work, is not an option but rather an unquestionable conviction of all those who are part of the Company. That is why all our actions, whether internal or with third parties, are governed by honesty and trust, thus avoiding any influence, motivation, consideration or personal or third-party interest which could cause a possible conflict of interest, may interfere with our professionalism.

Likewise, in the exercise of our business activity we work in the continuous search for professional excellence. Based on the above, we act with integrity, avoiding all forms of corruption (either active or passive) and with respect for the circumstances and needs of all subjects with whom we interact.

We also promote that those behaviors being consistent with the principles set out in this Code be acknowledged and valued.

4.3 Medio ambiente y salud de las personas

Preservation and respect for the environment is one of the basic pillars of our actions, which is evidenced through compliance with the best environmental practices in all the activities we perform. We show our commitment to act at all times in accordance with the criteria of respect and sustainability, adopting habits and behaviors consistent with the best environmental practices, among others, those that follow:

- Respect for the environment by making rational use of natural resources.
- Compliance with current environmental legislation and, where applicable, with voluntarily accepted commitments.
- Introduction of guidelines for continuous improvement in environmental behavior.
- Development of comprehensive production programs in order to reduce the environmental impact which can be caused by the practices used in stone fruit production and on the safety and health thereof.

Additionally, in our relationships with contractors, suppliers or external partner companies, we promote these principles by demanding compliance with law.

4.4 Food quality and safety

We are aware of the impact our activity can have on health of people, which is why we focus all our efforts and resources on guaranteeing the quality of our products and meeting the appropriate food safety parameters. This is why we have specialists in this matter and the recognition of different certifying entities in terms of quality, legal and regulatory compliance and food safety (HACCP, IFS, BRC, GLOBALG.A.P.).

The quality controls we carry out are performed by the personnel assigned to the company's quality department and are the basis for ensuring that the developed processes comply with the appropriate parameters in terms of health and safety.

On the other hand, the commitment to the quality and safety of our products is materialized in the traceability tools we have in place, through which we offer customers in-depth knowledge of each of the practices carried out, complying with the principle of integrity and professional excellence.

4.5 Respect for Fundamental Human Rights

The Company is committed to the defense, respect and protection of basic labor rights, and of human rights and public freedoms recognized in the Universal Declaration of Human Rights, following the GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS (UNGPR) in order to implement the United Nations "Protect, Respect and Remedy's Framework".

4.6 Respect for People

People who are part of the Company represent its main value, whereby taking care of them and contributing to their development is among our priorities.

The Company establishes the following commitments towards the personnel, and in turn, the entire personnel establish these internal commitments:

4.6.1 Respect for people and their privacy

We respect the right to personal and family privacy of all the people who are part of the Company, in all its manifestations, and especially with regard to personal data. Likewise, we respect their personal communications through any means and make a responsible use of corporate communication media, computer systems and, in general, any other means that the Company makes available to us. However, all information means we use in our professional performance, such as email or telephone, are considered work tools, this being expressly determined in the Company's internal policies and procedures. Therefore, we must use these means in a professional way and be aware that the Company, in order to guarantee the proper use thereof, can monitor or implement the appropriate control measures.

4.6.2 No discrimination, mutual respect and equality

Our work environment is free of any type of discrimination based on gender, race, sexual orientation, religious beliefs, political opinions, nationality, social origin, disability or any other personal, physical, or social condition of the professionals who are part of the Company. To this aim, within the Equality Plan, a Protocol for the Prevention and Treatment of Harassment in the different companies belonging to the Company has been approved; through said protocol, the principles and guidelines of action that must govern to prevent, and, where applicable, correct this type of behaviors are defined.

We promote equal treatment between men and women regarding access to employment, training, and promotion of professionals and to working conditions. All of this implies avoiding both direct and indirect discrimination, having to strictly respect that (i) all selection and promotion processes are based on the merit, capacity, and experience of the candidates, (ii) there is no discrimination in the selection of employees with psychophysical disabilities, and (iii) the principle of equality and proportionality is respected as regards the terms and conditions of employment contracts.

In the same way, the relationships between the people who are part of the Company are based on professional respect. In said relations, a respectful, professional, and friendly treatment must prevail, with the aim of promoting a pleasant, agreeable, and safe work environment.

Finally, we prohibit and do not accept any manifestation of violence, abuse of authority and any type of harassment, whether physical, psychological or moral, practice of modern slavery, as well as any other conduct that may generate an intimidating, offensive or hostile work environment to people both in the company and third parties with whom the Company establishes commercial relationships or relations of any kind such as suppliers, collaborators, customers and other related parties.

4.6.3 Commitment to the prevention of occupational risks

A safe work environment is a priority for us, the permanent improvement of working conditions and the safety measures adopted in our facilities being the objective of all those who are part of the Company.

Thus, we give the utmost importance to the protection of the physical integrity and health of the people who are part of the Company, which is why we promote a safe and stable environment by all means, permanently updating labor risk prevention measures.

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By reason of the above, we know and comply with the applicable regulations and the relevant internal policy on this matter in all places where we carry out our professional activity, continually improving our processes, practices and work systems with the aim to guarantee safety and health of people at all times.

4.6.4 Absence of conflicts of interest

Our professional decisions must be based on the best defense of the Company's interest. Therefore, we must avoid situations that may involve a conflict between our personal interest and those of the the Company, refraining from representing the Company or taking part or influencing decision-making instances in which we have a personal interest, either directly or indirectly.

Likewise, we are committed to reporting any situation where a conflict of interest to the Social Responsibility and Ethics Committee is involved; said Committee shall make available and manage the corresponding record related to this type of incidents. Finally, under no circumstances whatsoever may operations or activities that entail or may entail a conflict of interest be carried out, except through prior written authorization from the Company Social Responsibility and Ethics Committee in case it determines that the activity or operation does not entail a risk in this matter.

4.7 Business Ethics

In our relationships with customers, suppliers, collaborators, organizations and Public Administrations, competitors and partners, as well as with other agents, we base on the principles of integrity, honesty, equality, professionalism, transparency and free competition.

4.7.1 Commitment to the customer

We act with the aim to offering the highest levels of quality and excellence in our products, with the ultimate goal of satisfying the needs and demands of our customers and end consumers.

In the relations with our customers, our professional activity is based on the principles of honesty, impartiality, respect, trust and integrity, committing to ensure that no action can be interpreted as deception to the detriment thereto.

That is why our primary objective is to satisfy the customer in the following way:

- By providing clear, truthful and timely information about all our products;
- By applying transparency standards in the operations we carry out;
- By providing customized advice to the client when so required; and
- By giving a professional and streamline treatment to any incident that may arise.

Thus, whenever a contract is entered into, acting on behalf of the Company, it shall be done with the will and commitment for the agreement to come into force and to comply with everything therein set out. Therefore, we cannot prevent or hinder compliance of the agreements signed by the Company or the obligations incurred therein.

Likewise, we do not negotiate or carry out operations on behalf of the Company without having the corresponding authorization.

4.7.2 Relationships with suppliers and contactors

We consider our contractors, suppliers and, in general, partner companies, essential to achieve our objectives. Therefore, their selection processes are adapted to objectivity and impartiality criteria, avoiding any conflict of interest or favoritism in their selection.

On the other hand, we put our values into practice in our relationships with the companies and people who collaborate with us, actively working to convey to them our values and rules of behavior, which are reflected in this Code. Likewise, we promote and foster collaboration with suppliers and contractors who accredit social, environmental and ethical standards being consistent with those we apply.

In this sense, the Company selects those suppliers and contractors who carry out their activities in an ethical and lawful manner following the provisions set forth in their Responsible Procurement Policy. Thus, priority is given to those suppliers whose business practices respect human dignity, do not violate current legislation and do not endanger the Company's reputation.

4.7.3 Anti-corruption commitment

We are aware that participating, directly or indirectly through third parties, in bribery to authorities and/or public servants or to directors, employees or collaborators of entities related or not to the Company is strictly prohibited.

Any act related to bribery or influence peddling of which we become aware within the Company's activity shall be reported, pursued, rejected and, where appropriate, punished.

Likewise, we know that we cannot accept, request, promise or receive from officials, political parties, candidates, foundations or similar entities or individuals related thereto, directly or through intermediate third parties, payments, gifts or entertainment outside licit usages and customs.

A gift, no matter how small, can be a great expression of personal appreciation, or a work lunch can be the best place to discuss issues related to the business and strengthen our relationships with customers. Nevertheless, sometimes, if proper precautions are not taken, they could appear to be an attempt to achieve illicit influence, putting at risk the values of integrity and respect for business relationships existing in our code of ethics and even violating law.

The Company, in its motivation to leverage and promote the economic, social and environmental development of the communities in which it operates, may participate and/or make contributions and donations to non-governmental, civil and similar organizations, linked to disadvantaged groups, at risk of social exclusion or similar situations. It may also collaborate in actions, acts, events or similar occasions related to environmental protection, promotion of healthy lifestyle habits, education, sports, culture, scientific or research events, as well as any other that is not contrary to the provisions set out in this Code of Ethics. Apart from these institutions, the Company maintains a donation-restricted policy, giving particular attention to donations or payments of money made to political parties. In any case, all donations, contributions, patronages, sponsorships and similar supports must always be requested and expressly authorized by the Social Responsibility and Ethics Committee, which shall comply with the provisions set out in the corresponding policy.

Any person at the Company who has doubts about the acceptance, granting of gifts or similar attentions, as well as travel and representation expenses, before making any decision, shall request advice from the Social Responsibility and Ethics Committee or from the Human Resources Department, as well as comply with current internal policies and standards.

For an act entailing a type of bribery or related to corruption to exist, a simple promise or offer of a benefit is sufficient, without the need for material delivery or actual granting of the benefit. In passive bribery, our improper actions can benefit that who commits bribery or a third party.

Any illicit benefit, not just of an economic nature, can be considered an act of corruption; It can be any consideration in kind, such as gifts, trips or entertainment.

Passive bribery could exist, even if the benefit is obtained by a person other than us (for example, a family member or friend).

The so-called “facilitation payments”, that is, payments of sums of money or delivery of tangible or intangible items made to public servants to expedite or facilitate administrative transactions also constitute bribery, even if they involve a reduced sum or value. All this always according to the applicable local regulations.

Thus, we must pay special care to the relationships we establish with those third parties that are public organizations or authorities, being committed to comply with the provisions set out in this Code, as well as the applicable internal policies and standards. Additionally, at all times we must maintain an attitude of collaboration and transparency with any Public Administration or corresponding supervisory body in each country, and in case of any requirement, inspection or supervision visit that may be made to our company.

4.7.4 Free-competition

We operate in the market in compliance with antitrust regulations, applicable in the territories where we carry out our activity. In no case do we perform any type of misleading or defamatory advertising of our competitors or of other third parties.

Likewise, we reject any activity related to the alteration or fixing of prices with other companies in the sector aiming at restricting competition, thus leaving other companies out of the market.

4.7.5 Veracity in marketing operations and transparency in pricing

We ensure the veracity, accuracy, integrity and precision of the information we offer to customers about the characteristics and conditions of our products.

In this way, we commit to respecting, in all marketing and sales operations, the principle of transparency of both prices and other conditions related to the products offered.

4.7.6 Tax Obligations

We guarantee the veracity of our financial information, so that it reflects a true picture of our assets and financial situation.

The accounting and tax information strictly follows the behavioral guidelines set by our company, resorting, where appropriate, to the support of external advisors for the drawing up thereof. Likewise, the personnel in charge of the Accounting Department must save and preserve all documentation used in the exercise of their professional activity.

On the other hand, we prohibit and sanction the sale, transfer, assignment, concealment, etc. of any property owned by the Company, which we may carry out in order to avoid compliance with our responsibilities and obligations towards creditors, therefor having specialized personnel dedicated to the Company's assets accounting management.

Further, we consider our corporate image and reputation as one of the most valuable assets to preserve the trust of our members and third parties (suppliers, customers, collaborators, etc.), which is why maintaining the integrity of our accounting results, as well as in our tax obligations is of the utmost importance for us.

Likewise, we ensure compliance with Tax and Social Security obligations to which we are subjected, pursuant to current legislation both at the national level and in the countries in which we operate.

Finally, we condemn the evasion of mandatory payments and installments as well as obtaining undue benefits to the detriment of the Public Treasury, on behalf of the company.

4.7.7 Information Security

We consider that one of the main elements on which trust of our customers and collaborators is based is the appropriate safeguarding of the information and the effective limitation of its use, in accordance with the provisions set out in the legal provisions or contractual relationships applicable in each case.

To that aim, we are committed to preserving the confidentiality of the information we obtain within the framework of our relationships with third parties, and we do not make use thereof in areas other than those in which said information has been obtained.

4.7.8 Protection of intellectual and industrial property

We are aware that the Company punishes any action related to the reproduction, plagiarism, distribution or public communication of a literary, artistic or scientific work fixed on any medium, without the authorization of the owners of the corresponding intellectual property rights.

Likewise, we are aware that it is prohibited to make copies of registered industrial designs and/or distinctive signs, and we must respect at all times the industrial and intellectual property rights of both the Company and those of all the owners to which we have access.

On the other hand, we know that the use, download or installation of computer programs is not permitted without prior obtaining the corresponding authorization and alignment with the Company's information technology policy.

4.7.9 Privileged and confidential information

The Company has in place an Information Security Policy whose objective is to preserve the confidentiality, integrity and availability of the company's data. This is why its content cannot be disclosed or assigned to third parties, with the sole exception of the legal, administrative or judicial obligations we have imposed in this regard.

The Company information is the property of the company and is essential for the development and success of its activity. The Group of professionals must understand how to classify the information they manage and make use thereof in accordance with the company policies and applicable laws and regulations.

Consequently:

- Security of the information is an activity that concerns all employees, whereby they must protect the information and perform their activities undertaking and applying the security standards and procedures duly set out. In this way, they must verify with the IT Department the appropriate channel to transmit sensitive information.
- No employee shall use the information to which they have access by virtue of their work for purposes other than those legally or contractually established. Likewise, they shall not share personal or company passwords.
- All information related to customers, shareholders, employees, suppliers, strategic plans, financial, commercial, statistical, legal or similar information must be considered confidential and treated accordingly.
- The processing of personal data must be carried out guaranteeing the right to privacy of individuals and subject to regulations on personal data.
- All employees are subject to confidentiality obligations by signing the confidentiality clause established for the purpose thereof.
- Any reasonable evidence that affects or may affect the security of privileged and confidential information shall be immediately communicated to The Company.
- Employees shall not open any email, link or attachment without identifying the sender or, in case the sender has been identified, nor will they do so when there is suspicion of the sender's authenticity. Likewise, they shall not respond to any request for information from unknown sources.

We know that destruction, alteration, disablement or unlawful damage to data, programs or electronic documents of the Company or of third parties is strictly prohibited, as well as unauthorized access to computers and the use, download or installation of software not provided or authorized by the Company. Additionally, we are prohibited from modifying devices or installing programs that are not part of the application package previously installed/authorized by the Company and not aligned with the IT policy.

On the other hand, we have enough security means and apply the established procedures so as to protect privileged and/or confidential information from any internal or external risk related to non-consensual access, manipulation or destruction, both intentional and accidental. In this sense, we must maintain the confidentiality of the contents of the Company's privileged information and not disclose or use the aforementioned information for private purposes.

4.7.10 Protection and appropriate use of work means made available by the Company

The Company makes available to its employees, the facilities, means and tools necessary for the performance of their professional duties, which is why they shall not be used for other purposes.

By reason of the above,

- All employees must use the work means and tools that the company makes available to them (telephone, computer, email, Internet access, etc.) exclusively for the purposes of carrying out the work activities each one is entrusted with, and not intended for private or other uses.
- All employees must take care of the Company assets by protecting them from damage, loss or theft. It is everyone's responsibility to protect the Company assets.

4.7.11 Prevention of money laundering and terrorism financing

We comply with national and international legislation related to fight against money laundering and terrorism financing. In this sense, we undertake the commitment not to maintain commercial relationships with entities or people not complying with these guidelines.

5. Development and Compliance with the Code of Ethics

This Code sets out business ethics principles and commitments we must respect and comply with in the exercise of our activities.

5.1 Application control

The Company has a Social Responsibility and Ethics Committee created within the framework of its Criminal Risk Prevention Model, which is assigned, among other functions, supervising compliance with this Code. Thus, the Social Responsibility and Ethics Committee shall include in its review model, the necessary controls to verify that the provisions set forth in the Code of Ethics are complied with, shall make the necessary proposals for its improvement, and shall report to the Board of Directors, on an annual basis, the degree of compliance and possible non-compliance detected.

5.2 Dissemination and evaluation

The internal and external dissemination of this Code of Ethics is the responsibility of the Social Responsibility and Ethics Committee with the support and collaboration of the Human Resources Department, which shall use the appropriate means at all times in order to guarantee a correct dissemination thereof, both at the internal and external levels.

The Human Resources Area oversees organizing the necessary training for the adequate knowledge and interpretation thereof by the personnel.

5.3 Update

The Board of Directors, if deemed appropriate, shall periodically review and update the Code of Ethics based on the annual report of the Social Responsibility and Ethics Committee, taking into account the suggestions of the professionals who are part of the Company, as well as any third party with legitimacy to do so, because of being affected by the provisions of this code.

5.4 Acceptance

Both the professionals who are currently part of the Company, and those who will be part thereof in the future, expressly accept the full content of this Code of Ethics, which shall become part of the respective employment contracts upon its approval by the Board of Directors.

6. Non-compliance and your duty to report

We are obliged to inform and report possible risks or breaches of the Code, of any other internal standard or action protocol and/or of any action that could be considered illegal or criminal, of which we are aware or suspect, through a duly grounded report allowing the identification of the triggering event, as well as those allegedly involved therein.

The ethics channel (hereinafter, the “Ethics Channel”) is the internal reporting system that the Company makes available so that any person can report irregularities and violations (or risks of violations) of the applicable legal regulations or of the Code of Ethics, pursuant to Law 2/2023, dated February 20, regulating the protection of people who report regulatory breaches and fight against corruption (the “Whistleblower Protection Law”) and to applicable local regulations.

The Ethics Channel is the preferred channel for reporting identified risks or irregularities. However, the Whistleblower Protection Law also establishes an external channel before the Independent Whistleblower Protection Authority (“WPA”) or, where appropriate, before the competent authorities or bodies of the autonomous communities.

the Company guarantees the confidentiality and absence of retaliation of the whistleblower, being it strictly prohibited to retaliate against anyone who in good faith reports the company a possible violation of this Code, a possible behavior contrary to law and/or, where appropriate, which may imply the materialization of a criminal risk. Likewise, confidentiality and absence of retaliation are guaranteed for people who collaborate in the investigation processes. However, these guarantees do not extend to those who act in bad faith with the intention of spreading false information or harming people.

7. Disciplinary Procedure

We adopt the necessary measures for the effective application of the Code of Ethics. No one, regardless of his/her level or position, is authorized to request that any of the people making up the Company commits an act contrary to the provisions set out in this Code. Likewise, improper conduct shall not be justified based on the order given by an immediate superior.

Failure to comply with the rules contained in this Code may give rise to disciplinary sanctions, in accordance with current labor regulations, without prejudice to the administrative or criminal sanctions that may result therefrom.

Likewise, failure to comply with internal regulations by a person with whom the Company has a business relationship may also give rise to the corresponding consequences in relation to the fact and the applicable regulations.

The Board of Directors shall adopt the corresponding decision on the disciplinary measures to be applied by the Human Resources Department, in accordance with the provisions set forth in the applicable regulations; the Social Responsibility and Ethics Committee shall be responsible for the effective and correct application of said measures.

8. Validity and updating of the Code of Ethics

The initial version of this document was approved by FRUTAS ESTHER's Board of Directors on December 15, 2020, entering in force on that same day until the following version approval.

This latter version, like the initial document, has been subjected to an approval process by the Board of Directors and shall be valid as long as no modification is made thereto.

The modifications made to the Code shall be approved by the Board of Directors, following a proposal and report from the Social Responsibility and Ethics Committee.