HELLAGRO S.A.

CORPORATE CODE OF CONDUCT

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CORPORATE CODE OF CONDUCT

1. INTRODUCTION

This Corporate Code of Conduct ("Code") sets forth the ethical, environmental, and social standards that all suppliers, business partners, and subcontractors (collectively referred to as "Suppliers") are expected to uphold when engaging in any business activity with our Company. This Code reflects our commitment to responsible corporate governance and adherence to internationally recognized ESG (Environmental, Social, and Governance) principles. Suppliers are expected to fully align their operations, policies, and practices with the obligations described herein.

2. ETHICAL BUSINESS PRACTICES

Suppliers shall maintain the highest standards of integrity, professionalism, and transparency. This includes, but is not limited to:

- Full compliance with all applicable local, national, and international laws, regulations, and industry standards.
- Zero tolerance for any form of bribery, corruption, facilitation payments, fraud, extortion, or embezzlement.
- Maintaining complete, accurate, and accessible business and financial records.
- Avoiding situations that may give rise to conflicts of interest and disclosing any potential conflicts promptly.
- Conducting business dealings honestly and responsibly, ensuring fair competition.

3. HUMAN RIGHTS AND LABOR STANDARDS

Suppliers must respect the inherent dignity and rights of all individuals. They are required to adhere to internationally recognized labor and human rights frameworks, including the UN Guiding Principles on Business and Human Rights and ILO conventions.
Obligations include:

- Prohibition of forced labor, bonded labor, modern slavery, and human trafficking in any form.
- Prohibition of child labor, ensuring that no individual below the legal minimum working age is employed.
- Provision of safe, respectful, and inclusive working environments.
- Ensuring employees receive fair compensation, lawful working hours, and legally mandated benefits.
- Strict prohibition of discrimination based on gender, race, age, disability, religion, national origin, sexual orientation, or any other protected characteristic.
- Respect for employees' rights to freedom of association and collective bargaining.

4. ENVIRONMENTAL RESPONSIBILITY

Suppliers must demonstrate a proactive and responsible approach to environmental management by:

- Complying with all relevant environmental laws, regulations, and permitting requirements.
- Implementing systems and practices to minimize environmental impact.
- Reducing carbon emissions, improving energy efficiency, and promoting renewable energy sources where feasible.
- Managing waste responsibly, reducing pollution, and ensuring proper disposal of hazardous materials.
- Promoting sustainable resource use, circular economy principles, and environmentally friendly materials.

5. HEALTH & SAFETY

Suppliers are required to maintain robust health and safety management systems to protect employees, contractors, visitors, and local communities. Obligations include:

- Ensuring workplaces are safe, hygienic, and compliant with all applicable health and safety regulations.
- Providing adequate training, equipment, and supervision to prevent workplace accidents and occupational illnesses.
- Implementing incident reporting mechanisms and corrective actions.
- Continuously improving safety performance through monitoring and preventive measures.

6. DATA PROTECTION AND CONFIDENTIALITY

Suppliers must ensure the secure handling of all confidential, proprietary, and personal data shared in the course of their business relationship with our Company.
This includes:

- Full compliance with applicable data protection laws (e.g., GDPR or relevant national legislation).
- Protecting data from unauthorized access, disclosure, loss, or misuse.
- Using Company data solely for legitimate and authorized business purposes.
- Promptly notifying the Company of any actual or suspected data breach.

7. COMPLIANCE, MONITORING & REPORTING

Our Company reserves the right to verify Supplier compliance with this Code through audits, self-assessment questionnaires, on-site inspections, and reviews of relevant documentation. Suppliers must:

- Cooperate fully and transparently with all monitoring activities.
- Provide accurate, complete, and timely information upon request.
- Immediately disclose any non-compliance, violations, or risks that may impact their adherence to this Code.
- Implement timely corrective actions to resolve any identified deficiencies.

8. SUBCONTRACTING & SUPPLY CHAIN RESPONSIBILITY

Suppliers are responsible for ensuring that their own supply chains uphold the standards of this Code. This includes:

- Communicating the Code’s requirements to subcontractors and sub-suppliers.
- Ensuring that third parties engaged in work related to our Company also comply with ESG principles.
- Monitoring the behavior and performance of their supply chain partners.

9. ANTI-BRIBERY AND ANTI-CORRUPTION

Suppliers must uphold the highest standards of integrity and must not engage in any form of bribery or corruption. This includes:

- Prohibition of offering, giving, receiving, or soliciting bribes, kickbacks, facilitation payments, or any improper financial or non-financial advantage.
- Ensuring that all business decisions are made objectively and free from undue influence.
- Maintaining clear, accurate, and auditable records of all financial transactions.
- Implementing internal policies, training, and controls to prevent bribery and corruption.
- Ensuring compliance with all relevant anti-bribery legislation, including but not limited to the UK Bribery Act, U.S. Foreign Corrupt Practices Act (FCPA), and applicable local laws.

10. WHISTLEBLOWING & REPORTING MECHANISMS

Suppliers must establish and maintain secure and confidential channels for employees and stakeholders to report concerns or suspected violations. Requirements include:

- Providing a safe environment where individuals can raise issues without fear of retaliation, intimidation, or disciplinary action.
- Ensuring reported concerns are investigated promptly, fairly, and transparently.
- Implementing appropriate corrective actions based on investigation outcomes.
- Encouraging a culture of accountability, transparency, and ethical behavior.
- Notifying the Company immediately when concerns or violations relate to activities connected to our business.

11. CONTINUOUS IMPROVEMENT

Suppliers are encouraged to pursue continuous improvement initiatives related to ethics, sustainability, innovation, and social responsibility. The Company may support dialogue and collaboration to strengthen ESG performance across the value chain.

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SUPPLIER ACCEPTANCE

By signing below, the Supplier confirms that they have read, understood, and agree to comply with the Corporate Code of Conduct. The Supplier also acknowledges responsibility for ensuring that all employees, subcontractors, and affiliated entities adhere to the standards outlined in this document.

Supplier Name:	
Authorized Representative:	
Title / Position:	
Signature:	
Date:	

By signing this acknowledgment, the Supplier affirms their commitment to ethical conduct, environmental stewardship, and social accountability in alignment with internationally recognized ESG principles.

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