

Code of Ethics and Conduct



OUR JOURNEY
FOR GOOD


Benefit
by frulact

frusenses  frulact

MESSAGE FROM THE EXECUTIVE BOARD

The last few years have been years of transformation and growth for the Frulact Group.

We believe that growth is crucial in order to create more jobs, generate more wealth, enable more investment and reach more customers in more countries. However, we will only be fulfilling our mission if this growth is sustained by the culture and principles of Ethics and Conduct that have always been the hallmark of the Frulact Group:

- a) Respect for our people;
- b) Rigour in the process and respect for the planet;
- c) Value sharing;
- d) Transparent and truthful communication.

The Code of Ethics and Conduct is therefore intended to be a guideline for all those who interact with Frulact. It should be read carefully and those to whom it is addressed should ensure that they understand the duties it entails.



To our employees we would like to express our belief that, in all your decisions, you are trying to promote our common good. But we know that throughout your professional career at Frulact, you will often be faced with situations that generate uncertainty. We would like you to use this document to ensure that your decisions are taken in line with the principles you have committed to. If you are still uncertain, please do not hesitate to contact the Conduct Committee. We have chosen to publicly distribute the document because we wish everyone to be aware of the ethical and behavioural principles that govern us. In doing so, we also wish to promote them to our external stakeholders and emphasise that we are willing to work in partnership to implement these principles across the board, which we believe will contribute to a fairer market that respects people, as well as the planet.

The Group's Executive Board undertakes to ensure that the Code of Ethics and Conduct is properly disseminated and understood, as well as to monitor the Group's ethical performance in the pursuit of continuous improvement.

We will continue to work together, striving for excellence and ethics in everything we do.

Thank you for being part of this journey!

THE EXECUTIVE COMMITTEE

Dinorah Mandic | CEO

Clara Meira | CINO – Fruit Prep

Luís Amaral | CFO

Paulo Leal | CMO

Rogério Silva | COO

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1 ● OUR CODE OF ETHICS AND CONDUCT

Framework

We consider that any entity or individual operating on behalf of the Frulact Group is considered a stakeholder and is contractually bound to comply with the content of the Code of Ethics and Conduct. Therefore it must act in a manner consistent with the commitments undertaken by the Frulact Group.

We want everyone to feel encouraged to:

- carry out their duties in accordance with these principles,
- ask for guidance whenever necessary,
- report any irregularities whenever identified.

The present Code of Ethics and Conduct is applicable to all entities owned, directly or indirectly, by Frulact Group companies, and it strengthens compliance with all applicable laws and regulations in the countries where it operates. In this regard, whenever deemed necessary, adjustments will be made to this document in order to comply with the applicable legislation and regulations in force in each of the countries where the Group's companies are located.

The duties laid down in this document are supplemented by other Group texts, such as the Integrated Management System Policy or the Employee Handbook. The present Code of Ethics and Conduct may be revised and updated at any time, according to practical or legal needs that arise.

Conduct Committee

The Conduct Committee is the internal structure whose mission is to disseminate and guarantee the correct implementation of the Code of Ethics and Conduct.

It is staffed by:

- Global Head of FrUPeople - Rita Pereira
- Legal & Compliance Coordinator - Ana Pinheiro
- Planning Control Specialist - Nathalie Marcos

The Conduct Committee's duties include:

- Proposing changes to the Code of Ethics and Conduct, in the understanding that it is a dynamic document that can be improved to contribute to the common good.
- Ensuring the correct functioning of the communication tools associated with the Code of Ethics and Conduct, in particular by guaranteeing compliance with the legal regulations on confidentiality in the processing of information, as well as the absence of reprisals.
- Clarifying any queries about the Code of Ethics and Conduct referred to it by any stakeholder, using internal or external support whenever necessary to ensure compliance with this document and the legislation in force in the region.
- Receiving, analysing and forwarding situations of suspected non-compliance with the Code of Ethics and Conduct.
- Immediately reporting serious matters to the Executive Board, always protecting those who report them and the people involved in the process.
- Preparing a global report for the Executive Board to analyse and duly implement measures that will enable the Frulact Group to improve its activity.

Frequently Asked Questions

1. WHAT IS THE CODE OF ETHICS AND CONDUCT?

The Code of Ethics and Conduct defines the way in which the Frulact Group is expected to fulfil its duties and responsibilities to all its Stakeholders, namely: shareholders and governing bodies, employees, trainees, government bodies, customers, suppliers, financial institutions, partners, the community in general, as well as the planet. This document reflects the Frulact Group's commitments, defining behavioural benchmarks that its stakeholders should require within the company and in relations with the outside world.

2. WHO IS THE CODE OF ETHICS AND CONDUCT AIMED AT?

It is aimed at all stakeholders: organisations and individuals who have contractual, economic, institutional and/or social links with the Frulact Group.

All Frulact Group stakeholders must read and duly understand the Code of Ethics and Conduct in order to ensure that it is applied throughout the group's operations.

3. HOW TO LEARN ABOUT THE CODE OF ETHICS AND CONDUCT?

The Code of Ethics and Conduct is available to all Stakeholders on our website:

<https://frulact.com/pt-pt/o-nosso-grupo/etica-empresarial/>

It is also available on the intranet for Frulact Group employees to consult.

Upon joining the Frulact Group, all employees are invited to read the Code of Ethics and Conduct. Whenever deemed appropriate, particularly when preparing a new revision of the document, training sessions will be organised to disseminate this document to employees.

4. WHEN IN DOUBT, HOW TO PROCEED?

The Code of Ethics and Conduct identifies the key elements for acting ethically in accordance with the Frulact Group's culture, but it does not contain the answer to every concern. When in doubt and before making any decision about how to operate, consult the teams with technical knowledge for proper clarification. It's important that you feel confident and aligned with the ethics of your decision, so don't hesitate to ask any questions.

5. IN SITUATIONS OF A POSSIBLE NON-COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT, HOW TO PROCEED?

Whenever any stakeholder finds that a specific undertaking has not been fulfilled, they are required to report the incident, which will then be analysed.

Any behaviour that does not comply with this document, such as inappropriate behaviour, disrespect for others or for the institutions they represent, is considered to be non-compliance.

It is vital that all communication is carried out as quickly as possible and in a clear and transparent manner, trying to anticipate and clarify any concerns that may arise and in order to reduce the impact of non-compliance.

6. HOW CAN I REPORT A NON-COMPLIANCE?

You can report of non-compliance to Frulact in writing or verbally via the Frulact Whistleblowing Channel (website).

Anyone wishing to report a non-compliance can request a meeting with at least one of the Conduct Committee members to report the situation. Nonetheless, the report must always be transcribed (or dictated) on the Channel (with the support of whoever is present at the meeting).

All reports (written or verbal) are confidential and can be made anonymously.

Each report will be assigned a code, which helps to guarantee the protection of all those involved, and the whistleblower will always be able to monitor the status of his or her case through the means provided by the Channel.

Only the Conduct Committee will have access to the content of the reports.

7. HOW IS A NON-COMPLIANCE ANALYSED?

When the Conduct Committee receives a report related to a non-compliance:

- It acknowledges receipt of the report within 7 (seven) days;
- In the case of non-anonymous reports, the information is handled in such a way as to guarantee the confidentiality of the party reporting the situation;
- It analyses the information received and seeks to clarify technical queries with the relevant areas;
- When necessary, it listens to the people/teams/entities involved in the situation, trying to understand what doubts they may have raised and how they were resolved;
- It carries out any steps deemed appropriate;
- It draws up a report on the situation analysed with recommendations and measures to be duly adopted;
- It guarantees the timely implementation of the measures adopted which, where necessary, may include the opening of disciplinary proceedings and civil and/or criminal proceedings;
- It communicates the measures implemented to all the parties involved.

8. HOW DO WE TRY TO PROTECT THOSE INVOLVED IN THE ANALYSIS PROCESS?

All reports are encrypted.

Reports are shared exclusively with whoever is needed in the analysis process.

Anyone reporting a non-compliance can do so anonymously via the Whistleblowing Channel on the Frulact website.

If the report is not made anonymously, only the Conduct Committee is aware of the identity of the party who reported the situation of non-compliance.

Frulact does not promote any form of retaliation against anyone who has reported a confirmed situation of non-compliance. The party who only reports, and who had no involvement in the reported and confirmed non-compliance, cannot be harmed in any way, such as suspension, dismissal, demotion, transfer of duties, reduction in salary, coercion or unfair treatment.

The whistleblower must not use the whistleblowing channel inappropriately, promoting false or dishonest reports. Our employees undertake to use the Whistleblowing Channel with integrity, truthfulness, as well as ethics.

Anyone reporting a non-compliance is entitled to:

- confidentiality of its identity (unless disclosure is required by law);
- information on the receipt of its report (within 7 days);
- information on the status of the case and the outcome of the investigation (the deadline for informing a whistleblower of progress may not exceed three months).

To ensure that everyone has the opportunity to clarify their behaviour and motives, it is crucial to clearly identify all the people involved.

Guaranteeing the anonymity of all those involved cannot jeopardise the duty to:

- provide further information during the course of the investigation
- co-operate with and support the Conduct Committee to ensure full compliance with the Code of Ethics and Conduct.

Failure to fulfil this duty can even be labelled as a breach of the Code of Ethics and Conduct.

9. WHAT ARE THE CONSEQUENCES WHEN A NON-COMPLIANCE IS VERIFIED?

In the event of confirmed non-compliance, notwithstanding the applicable criminal and civil proceedings, internal censure proceedings may be initiated in accordance with the Group's procedures:

- internal censure procedures may be instigated in accordance with the Group's procedures;
- the necessary measures are taken to verify the implementation of corrective and preventive actions to ensure that it doesn't happen again;
- measures with an impact on commercial and/or partnership relations with external stakeholders.

For more information on the Whistleblowing Channel, please refer to the Guide attached to this document.

2 ● OUR PRINCIPLES OF ETHICS AND CONDUCT

2.1 RESPECT FOR OUR PEOPLE

1. RESPECT FOR OTHERS

Frulact Group's commitment

We promote harmonious and co-operative relations and ensure integrity and dignity in the workplace. We provide equal work opportunities to all employees based on their professional performance and qualifications.

We provide a working environment where everyone is treated equally, fairly, with dignity and respect. We do not accept discriminatory behaviour based on age, ethnicity, race, colour, nationality, health conditions, gender, sexual orientation, marital status, religious conviction, political conviction, party or trade union membership. Any kind of verbal or physical harassment, including moral and/or sexual harassment, is not permitted.

We promote a working environment where all employees feel free to raise issues related to the Code of Ethics and Conduct.

The commitment of our employees

In carrying out our duties, we are committed to complying with the basic regulations of coexistence, co-operation, as well as mutual respect, promoting polite and courteous treatment of others, regardless of who they are.

We intend to operate as follows:

- to be upright and honest;
- to communicate clearly and transparently;
- to co-operate with everyone in the workplace to build a common good;
- Not to be discriminatory for any reason;
- to be humble and recognise the need to learn, correct and be corrected;
- to ensure mutual respect, loyalty, co-operation, as well as honesty.

We undertake to communicate whenever we consider that the working environment does not fully comply with the principles set out in this Code of Ethics and Conduct.

2. HEALTH AND SAFETY AT WORK

Frulact Group's commitment

At the Frulact Group, safety is a crucial element that underpins all our decisions and operations. We are committed to excellence beyond simple compliance with regulations, promoting the creation of a space that not only protects, but also inspires confidence and well-being.

We assess risks on an ongoing basis, ensuring that all work areas are monitored and properly adjusted to avoid accidents. We promote safety observations as part of our process, allowing us to identify opportunities for improvement and ensure that every employee operates safely and responsibly.

We believe that safety is a collective responsibility that depends on everyone's active participation, transparency and willingness to collaborate. We create the ideal conditions for every voice to be heard and every idea to be properly valued.

We are constantly looking for new opportunities to learn, adapt and improve, particularly through continuous training, best practices as well as by sharing experiences.

We are dedicated to creating, not only a safe workspace, but also a culture of respect and empathy. The well-being of every employee is a priority. And every action we take reflects our commitment to ethics, integrity and sustainability.

The commitment of our employees

We understand that we play a key role in building a safe and healthy working environment. In our daily lives, we are responsible for our actions and are vigilant about the risks to which we are exposed. We base ourselves on open dialogue and collaboration, where everyone makes a positive contribution!

We are fully committed to participating actively and transparently in safety initiatives: taking part in training and awareness-raising activities, sharing risk situations, as well as identifying proposals for improvement. We take care of our safety and everyone else's!

3. FAIR CONTRACTUAL RELATIONSHIP

Frulact Group's commitment

We guarantee that the recruitment process is based on criteria of personal and professional qualifications. No candidate may be excluded at the outset for being an immediate relative or partner of a Frulact Group employee.

Hiring at the Frulact Group is always carried out while ensuring compliance with local legislation and promoting the fundamental values and rights of the human being. Under no circumstances will we hire against the will of the employee or a person under the age permitted by local legislation. Under no circumstances may the Frulact Group retain the employee's personal documentation, including identification documents and/or work visas. These criteria are applied to all aspects of the contractual relationship with the Frulact Group, including: remuneration, performance evaluation, promotions and transfers.

The commitment of our employees

We undertake to inform the FrUPeople management whenever we become aware of a family member or partner applying for a vacancy in the Frulact Group, ensuring that we are not involved in the decision-making process;

4. TRAINING

Frulact Group's commitment

We are committed to providing employees with the conditions to have the opportunity to participate actively and regularly in training activities.

We believe that training is a tool enabling to develop:

- the growth of our employees;
- the fulfilment of quality, environmental, as well as food safety requirements for our products;
- the awareness regarding the main health and safety hazards and risks at work;
- the compliance with legislation, standards and procedures.

The commitment of our employees

We recognise the importance of training, which is why we are committed to:

- ensure our active participation in the initiatives proposed to us;
- provide the necessary framework for others, including our subordinates, to actively participate in the actions proposed to them.

2.2 RIGOROUSNESS IN THE PROCESS AND ENVIRONMENTAL FRIENDLINESS

1. QUALITY AND FOOD SAFETY

Frulact Group's commitment

Our first duty is to guarantee the Quality and Food Safety of our products. In all our units we comply with local legislation and follow the strictest standards of Quality and Food Safety. If we identify any incident that could jeopardise the quality and food safety requirements of our products, we act immediately to ensure the least possible impact on customers and consumers.

We promote equal commitment from all our stakeholders.

Our Employees' Commitment

We are all aware that it is our duty to guarantee the Quality and Food Safety of our products. We are fully committed to ensuring compliance with Quality and Food Safety requirements in all our endeavours, including management, and throughout the entire value chain: from procurement, design, production, shipping and transport.

We know and are aware of the main risk factors and incidents that could jeopardise Food Quality and Safety. If we identify any issue that could jeopardise these requirements, we take immediate action and report the situation to our supervisors.

2. RESPECT FOR RAW MATERIALS

Frulact Group's commitment

We try to select the best producers and suppliers of raw materials/services. We share the knowledge we have from our experience with suppliers, seeking a culture of continuous improvement in processing practices.

Our Employees' Commitment

We recognize the importance of our suppliers and, as representatives of the Frulact Group, we are committed to treating them with respect and dignity.

3. EFFICIENT USE OF NATURE

Frulact Group's commitment

We are committed to reducing the environmental impact of our activity:

- We implement measures to ensure the efficient use of natural resources.
- We aware our employees of the importance of using natural resources efficiently.
- We promote the definition and monitoring of environmental targets throughout the value chain.

Our environmental indicators and metrics are publicly disclosed in the sustainability report.

Our Employees' Commitment

We ensure that we encourage the efficient use of all natural resources, fostering reduced consumption, reuse and recycling.

2.3 SHARING VALUE

1. TRUST-BASED RELATIONSHIPS

Frulact Group's commitment

All our external stakeholders, namely customers and suppliers, are considered our partners.

We foster strong and lasting relationships of trust within the Frulact Group, based on transparent and truthful communication.

The following scenarios deserve special mention:

- Corruption: we do not accept any form of interaction in which an offer or pledge of goods or services is made, directly or indirectly, to any of those involved with the aim of obtaining an undue advantage for the company, for themselves or through another party.
- Fraud: we do not accept any type of dishonest behaviour in order to obtain an advantage or that may cause harm to another party.
- Money laundering: we do not accept any situation that seeks to conceal the criminal origin of capital, goods or products.

Our Employees' Commitment

We honour the fact that every time we approach a partner, we are helping to consolidate the relationship of trust with the Frulact Group. Therefore, we must act in accordance with the Frulact Group's core values of respect, honesty and integrity.

2. PROMOTING HUMAN RIGHTS

Frulact Group's commitment

We are fully committed to ensuring compliance with the Universal Declaration of Human Rights and with local legislation that fosters compliance with this Declaration.

We operate with total integrity and seek to promote:

- the banning of slave or forced labour and trafficking in human beings, particularly for the payment of debts
- the banning of child labour and the use of child soldiers;
- the banning of labour contracts that force human exploitation or limit human freedom;
- the banning of illegal, coercive or fraudulent recruitment;
- freedom of association;
- non-discrimination on the grounds of sex, race, religion, economic situation, health or any other;
- to oppose situations of any kind of harassment or abuse: sexual, psychological or verbal.

We acknowledge that our external stakeholders, namely suppliers and customers, are separate entities from the Frulact Group, yet we encourage them to also share these fundamental ethos of respect for human beings and the planet.

Failure to respect these principles, even on the part of an external stakeholder, can jeopardise the Frulact Group's reputation and the level of trust in the market.

Our Employees' Commitment

We pledge to have zero tolerance for any event that infringes the Declaration of Human Rights. We undertake to expose all cases in which we identify a lack of respect for any human being or for the planet, regardless of who perpetrates them. If necessary, we will take immediate action to guarantee the integrity of people and the planet.

3. GLOCAL

GLOBAL WITH LOCAL ADAPTATION

Frulact Group's commitment

The Frulact Group is certified by different regulations in different geographies, implementing good practices across the board in all of the Group's units.

The Frulact Group's governing bodies ensure that all decisions are taken globally, but in accordance with the local reality, guaranteeing compliance with local legislation and regulations.

We are independent of public institutions and political parties. We are committed to co-operating with public authorities and local communities, showcasing our willingness and openness to contribute to improving the legal environment of our businesses.

Our Employees' Commitment

As the Frulact Group is a company with a global presence, and acknowledging the value and importance of diversity in our growth and in the Frulact Group's culture, we are committed to fostering diversity as well as understanding and abiding by the differences that exist in all geographies.

4. LAWFUL, FAIR AND UNBIASED DECISION-MAKING

Frulact Group's commitment

We promote all decision-making processes:

- in a lawful manner: complying with all local legislation and with the best international practices for tackling corruption and influence peddling.
- fairly: ensuring that we pay fair value for the goods or services we are buying or selling.
- in an impartial and unbiased manner: in other words, without the influence of factors other than those directly related to the process.

Therefore, in the event of a Conflict of Interest, we undertake to encourage the removal of any employee involved in the decision-making process who has a personal or economic interest that conflicts or could be perceived as conflicting with the interests of our company. By doing so, we endeavour to guarantee decision-making capacity that ensures the common good. Your direct intervention will only be authorised when strictly necessary and should ideally be validated by other members of the Frulact Group.

Our Employees' Commitment

Under no circumstance may we carry out activities that could be interpreted by our interlocutors as influence peddling, corruption, fraud, conflict of interest or money laundering. Accordingly, we may not make threats that jeopardise the integrity of any person or entity with whom we are dealing, or offer goods or services that are not directly related to the process in question.

We undertake to report to the leadership whenever we are involved in a decision-making process that involves, directly or indirectly, any entity with which we cooperate or have cooperated personally, or people to whom we are or have been linked by ties of kinship or friendship.

We also fully accept that this type of conduct, even on a personal level, can seriously damage the reputation of the Frulact Group.

5. GIFTS AND OFFERINGS

Frulact Group's commitment

The Frulact Group encourages its employees not to be involved in receiving or giving any benefit or advantage to the company, its employees or third parties.

This includes all practices that are unethical or contrary to the duties of the position, such as bribery, corruption, extortion, improper receipt, influence peddling or embezzlement. We always ensure compliance with local legislation and adapt our behaviour to the habits and customs of the countries in which we operate.

Our Employees' Commitment

We expressly reject being involved in any form of bribery, corruption, extortion, improper receipt, influence peddling, fraud or money laundering.

Whenever we are faced with a situation in which we receive offers or gifts addressed to us personally or through an intermediary by any stakeholder of the Frulact Group, we must ensure alignment with this Code of Ethics and Conduct, guaranteeing that these do not influence us or alter our decision-making in the processes in which we are involved.

Examples include gifts, entertainment and hospitality services, among others.

When refusing these offers may be a sign of disrespect, the employee should discuss the best way to proceed with their manager and FrUPeople, preferably by integrating these offerings into our community support activities.

6. USE OF GOODS AND SERVICES

Frulact Group's commitment

The Frulact Group provides its employees with a range of equipment and services for professional use, namely:

- personal protective equipment
- production technologies or concerning production support activities
- IT equipment such as computers, printers and mobile phones
- vehicles
- professional email
- internet access services

Specific regulations have been defined for access to these goods and services, which are presented to employees when they are given access to them. The setting of these regulations enables the Frulact Group to safeguard its employees and its business. If you have any concerns about their use, please do not hesitate to contact those in charge, who are available to provide the necessary information.

Our Employees' Commitment

We undertake to use the goods and services to which we have access in accordance with the regulations presented to us in order to promote the safety of ourselves, our colleagues, as well as the Frulact Group.

We fully understand that the use of this equipment for personal purposes must be carried out exclusively for the purposes set out in the terms and conditions and reduced to the minimum necessary to guarantee our comfort and well-being while ensuring everyone's safety at all times.

7. CUSTOMER SATISFACTION

Frulact Group's commitment

We are committed to supplying products and services in accordance with the quality standards established with our customers. We guarantee that the Customer has access to all the information they need:

- complying with the legislation in force;
- respecting the privacy of information;
- ensuring compliance with the agreed terms and conditions.

This information will be used in general when providing information and handling complaints.

Our Employees' Commitment

We treat all customer representatives with professionalism, courtesy, respect and loyalty, regardless of their level of hierarchy or responsibility.

We undertake never to make offers of goods or services unless:

- they are approved in advance by the superior;
- they are made on behalf of the Frulact Group;
- they are related to the business.

8. RESPECT FOR COMPETITORS

Frulact Group's commitment

We promote fair and healthy competition based on respectful relationships that comply with legislation and market criteria. We do not adopt any anti-competitive practices, including price fixing, coordination with competitors and discrimination against customers and suppliers. We do not hire anyone, including potential employees, who is covered by a non-compete agreement in force.

Our Employees' Commitment

We always treat all competitors' representatives with respect and courtesy, ensuring that we protect Frulact and its representatives. We share internally with transparency whenever said contacts exist. As Frulact employees, we do not engage in any activity that competes with those carried out by any Frulact Group organisation. We are well aware that, at the end of our contractual relationship, we must always respect and protect the Group's knowledge and intellectual property.

9. COMMUNITY SUPPORT

Frulact Group's commitment

We honour the fact that the benefits of our activity are also the result of the way we integrate ourselves into the communities where we do business. We are committed to seeking out and identifying opportunities that allow us to give back to the community. We endeavour to ensure that these activities are aligned with the Frulact Group's sustainability objectives, which are communicated in our report.

Our Employees' Commitment

We undertake that whenever we become aware of a local need in line with the Frulact Group's sustainability objectives, we will inform the FrUPeople team, which will be responsible for following up the request.

2.4 TRANSPARENT AND TRUTHFUL COMMUNICATION

1. SPEAKING WITH ONE VOICE

Frulact Group's commitment

We ensure that the Frulact Group's internal and external image is wholesome and consistent with our culture. We guarantee that the Marketing team supports any member of the governing bodies or employee who has to speak publicly on behalf of the Frulact Group.

We are aware of the importance of new online communication tools, the role of the individual in them and the potential impact of any mention of the Frulact Group's image, name or brand. We strongly encourage all our stakeholders to use the Frulact Group name in these communication mediums, respecting our image and our ethical principles. All cases of misinformation, slander, cover-ups and malpractice against the Frulact Group and its stakeholders will be scrutinised.

Our Employees' Commitment

Whenever we refer to the Frulact Group in any communication medium, including online sharing tools, and even in our personal name, we commit ourselves to:

- guarantee respect, loyalty, common sense and compliance with the ethical principles that have always characterised the Frulact Group;
- actively defend the reputation of the Frulact Group or its employees.

Whenever we are approached by the media, we must first request authorisation to answer the questions raised. When said requests are not made in a timely manner, we should courteously and politely forward the answers to the Marketing team, providing contact details.

2. PRIVACY AND DATA PROTECTION

Frulact Group's commitment

We promote the confidentiality of the information of all our Stakeholders, committing ourselves to keeping it secure and with limited access. We are committed to complying with the privacy and information security legislation in force in each of the countries in which we operate.

The Frulact Group has a privacy programme in place that allows the entire group to comply with the regulations in this area in all its geographies, by all its employees, in all their relationships.

This programme defines duties and rights and binds us to:

"Guarantee the privacy of your data, using it for legitimate purposes, in accordance with with the legal regulations in force and guaranteeing their rights."

The confidentiality of the data (including the personal data of the respective owners) extends even after the termination of the contractual relationship with the stakeholder, except where this is not legally or contractually required.

Our Employees' Commitment

We validate all the information we share, thus guaranteeing that it is credible and truthful.

We guarantee the confidentiality of any information received in the course of our work, unless there is a legal or contractual duty to the contrary.

We are committed to enforce:

- the principles of privacy and information security laid down in legislation;
- the Privacy Programme, thus ensuring compliance in the performance of our duties.

2. INTELLECTUAL AND INDUSTRIAL PROPERTY PROTECTION

Frulact Group's commitment

We ensure that all employees are aware that the Frulact Group owns any knowledge they may have regarding the development of products, operating processes, computer programmes, reports, studies or documentation developed by employees in the performance of their duties.

We undertake to assess the need to register intellectual and industrial property, taking into account the purpose to which it applies and depending on the geographical context. Whenever the Frulact Group's intellectual property rights are not observed, disciplinary and legal measures may be taken to protect the Frulact Group.

Our Employees' Commitment

We are aware that every day we have access to privileged and confidential information that we must protect.

We are aware that all the knowledge we produce as employees of the Frulact Group is the property of the Frulact Group and we may not at any time appropriate it or use it for our own benefit or that of third parties.

We undertake to obtain the necessary authorisation before sharing, using or allowing the use of this knowledge by any individual or entity outside the Frulact Group.

Our duties of protection and secrecy with regard to confidential knowledge obtained in the course of our work for the Frulact Group continue even after we stop working with the Frulact Group.

3 ● MESSAGE FROM THE CONDUCT COMMITTEE

We thank you for reading our Code of Ethics and Conduct.

As of now, we ask you to ensure compliance with the commitments made in this text. If you have any questions and can't find the solution in this document, feel free to contact the Conduct Committee and we'll be happy to help you.

Let's work together to create an environment of respect and mutual goodwill.

NOVEMBER 2024



