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1. OBJECTIVE.

Establish the principles and guidelines that guide the actions and decisions of Hortifrut and its subsidiaries to ensure that all our global operations are conducted with the highest standards of ethics and professional conduct, guaranteeing their uniform implementation in all subsidiaries considering local particularities and promoting an ethical organizational culture throughout the supply chain.

2. SCOPE AND EXCLUSIONS.

Scope: Corporate, applies to all Hortifrut subsidiaries. Addressed to all our collaborators, shareholders, other related parties and stakeholders, understood as customers, suppliers, contractors and, in general, to all those who are directly or indirectly linked to Hortifrut.

Exclusions: There is no.

3. ROLES AND RESPONSIBILITIES.

The Compliance and Internal Audit Management will be responsible for keeping this policy updated and ensuring its implementation and compliance.

In addition, to manage the Crime Prevention Model, carry out periodic controls and provide continuous training on business ethics and regulatory compliance.

4. DESCRIPTION.

Hortifrut will not perform, facilitate, promote or accept behaviors that violate the law and/or regulations in force, or that go against our internal ethical-social and crime prevention policies or that affect the interests of the company or our stakeholders.

All collaborators of the company must know and comply with the policies and procedures that make up Hortifrut's business ethics policy and are responsible for complying with them with transparency and professionalism.

The collaborators who have among their functions to carry out procurement or national or international negotiations must perform, before closing the procurement or negotiations, due diligence processes to adequately know the third parties, among others, to rule out the existence of links or conflicts of interest with them.

It defines the actions, behaviors and processes that our collaborators and as a company Hortifrut, seek to ensure compliance with ethical standards to prevent any inappropriate behavior that does not conform to internal policies and thus ensure transparency and safeguard the reputation and image of the company.

4.1. Values

- **Integrity:** Conduct is governed by ethical principles and values, making decisions based on them.



- **Innovation:** Creativity and originality when facing new and daily tasks. Receptive and open attitude to changes.
- - **Accountability:** Execution of tasks with responsibility and awareness of the acts, of how the actions of each one influence others.
- - **Passion and Commitment:** Involvement, satisfaction and enthusiasm for the work performed.
- **Partnership:** Teamwork, collaboration and companionship. Sum of efforts to achieve a common goal.

4.2. Prohibited conducts

We are committed to complying with all local and national laws on bribery, corruption and other unethical business practices. This includes:

- **Prohibition of Bribery and Kickbacks:** We do not tolerate the offer, acceptance or solicitation of bribes or kickbacks in any form.
- **Preventing Corruption:** We implement measures to prevent and detect any form of corruption, public or private, in our operations.
- **Anti-Fraud:** We adopt strict policies to prevent, detect and respond to any attempted fraud.
- **Concealment Conflict of Interest:** Do not declare conflicts of interest among collaborators, with third parties or with public officials.
- **Failure to disclose relationships with Public Officials:** If a meeting with a Public Official is necessary, it must be declared and a document must be left to support the topics discussed, according to the Policy.
- **Acceptance of Gifts and Invitations:** May be accepted in compliance with the Gifts and Invitations Policy.
- **Money Laundering and Terrorist Financing:** Prevention through a process of due diligence and continuous monitoring.
- **Contracts or agreements with third parties:** Clauses, representations or warranties regarding anti-bribery and anti-corruption conduct must be contained.
- **Declaration of Donations:** Must have a lawful purpose under the social responsibility framework and must be recorded in the accounts.

4.3. Crime Prevention Model

We have a crime prevention model managed by the Compliance and Internal Audit Management. This model includes:

- **Collaborators Ethical Conduct Code:** All collaborators must adhere to our ethical conduct code, which establishes the behavioral expectations and integrity standards defined by the company.



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- - **Supplier Ethical Conduct Code:** Establishes standards of ethical behavior and business conduct that objectively and transparently regulate each one of the different commercial activities involving all our suppliers.
- **Policies and Procedures:** We implement policies and procedures to prevent, detect and respond to any unlawful or unethical activity.
- **Training and Awareness:** We provide ongoing training to our collaborators on business ethics and compliance adapted to local realities and specific roles within the company. An evaluation of the effectiveness of these trainings is conducted to ensure that an ethical culture is promoted at all levels.
- **Whistleblower Channel:** We have confidential channels for collaborators to report any suspected inappropriate or illegal conduct on a nominated or anonymous basis, without fear of retaliation. Whistleblowers are handled confidentially and privately in accordance with the Whistleblower Intake and Investigation Policy: <https://denuncias.hortifrut.com/>
- **Prevention Clauses for Third Parties:** We require our business partners and suppliers to comply with our crime prevention and business ethics policies.
- **Prevention Clauses for Collaborators:** We inform our collaborators of the existence of a Crime Prevention Model, where they commit to act in an ethical manner, always within the framework of the law and to comply with their prevention and whistleblower obligations.

4.4. Consequences of non-compliance

Any breach of this policy will be treated seriously and may result in disciplinary and/or legal action. Depending on the seriousness of the offense, all cases will be evaluated in a fair, objective and proportional manner, respecting the rights of the parties involved and ensuring a transparent process.

5. REFERENCE DOCUMENTS

- Hortifrut S.A. Corporate Governance Document Development Manual.
- Crime Prevention Manual
- Collaborators Ethical Conduct Code
- Suppliers Ethics Conduct Code
- Policy on Relations with Public Officials
- Policy for Handling Conflicts of Interest and Related Party Transactions
- Gifts and Invitations Policy
- Whistleblower Intake and Investigation Policy

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6. AUTHORIZATION AND CHANGE CONTROL

VALIDATION ROUTE			
FUNCTION	NAME	POSITION	DATE
Developed by:	Katya Farfán Ruiz	Compliance America	09/27/2024
Reviewed by:	Gloria Pierret	Chief Legal Officer	10/22/2024
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	Marcela García	Food Safety & ESG Audit Corporate Director	10/22/2024
	María Elena Echenique	Chief Corporate Affairs Officer	10/22/2024
Approved by:	The Corporate Ethics Committee		10/31/2024

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