

# A SHARED COMMITMENT

Code of Conduct





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## LIVING OUR COMMITMENTS

## DEAR COLLEAGUES,

While we know we grow the best tomatoes, cucumbers, and peppers on Earth, we also know that this is only true because there is something special in the way WE grow them.

NatureSweet is founded on the notion that growing produce the right way can be transformative for our associates, our customers, and our communities. It's not always the easiest or fastest way to get things done. But we believe that the harder we work, the sweeter our products will be. This belief is at the heart of our commitment to growing a better kind of produce and a better kind of company.

It takes all of us, working at our best, to meet the ambitious standards we have set for ourselves. It is A Shared Commitment every NatureSweet associate and manager upholds. This Code of Conduct ("Code") is your guide to making and keeping that commitment. The pages ahead will lay out clear expectations that apply to everyone who works at NatureSweet. They will give you a better understanding of our purpose and help you follow the law and make the right decisions when things get complicated. We expect all associates to review this Code and live its principles every day.

I am grateful for and proud of every associate who makes the work we do possible. Together with all of you, I am excited to enable millions of agriculture workers to transform their lives.

Rodolfo Spielmann President and Chief Executive Officer





## NUTURE SWEET

## **OUR PURPOSE**

NatureSweet believes the more you put into something, the more you get out of it. We grow our produce with the goal of transforming lives. Having a transformational effect in the produce industry starts with our associates. Transforming their lives, and the lives of all agricultural workers in North America, begins by providing opportunity for our associates to earn a transformational wage, supporting continued education, and making improvements in our communities.

## **Our Principles**

Are the beliefs we embrace as a Company to guide us in how we operate.

## **Our Unleashers**

Are the behaviors expected from each associate to make our Principles a reality.





I AM ACCOUNTABLE I own the outcome.



I TALK STRAIGHT I talk straight, on time, and with clarity.



I AM PASSIONATE I dare to pursue my dreams.



I AM HUMBLE I regard others with the same esteem I regard myself. I learn from others to achieve greater things.



I AM A POWERFUL PARTNER I collaborate with others to reach shared goals.



## PRINCIPLES

### PROMISE

We reap what we sow. The more you invest in something, the more you get out of it.

### FREEDOM

We choose our own destiny. Our wellbeing depends on our decisions, not our circumstances.

### **ABUNDANCE**

We are committed to our purpose. Our commitment is the driving force to our success, no matter the obstacles or resources.

### **UNLEARN**

Everything evolves. In life, as with our crops, there are cycles. It is important to reinvent oneself and adapt to keep moving forward.

### **FUN**

The joy is in the journey. We enjoy our journey, making each moment a learning experience.





RESOURCES



# COMMITTED TO INTEGRITY

We bring integrity to everything we do. It is the first and most important seed we will ever plant.

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An Introduction to the Code
Our Responsibilities
How to Make Good Decisions
Reporting Concerns



## **AN INTRODUCTION TO THE CODE**

### Our commitment starts here.

Our tomatoes, peppers, and cucumbers need the right conditions to grow - and so does our Company. This Code helps our company cultivate the right kind of workplace for all of us to grow, thrive, and succeed. Think of it like an almanac for our business, only instead of weather conditions and planting schedules, it will show you:

- *I* How to operate ethically and lawfully
- *I* How to protect our business and keep things running smoothly
- I How to deal with realistic challenges that may occur on the job
- What to do when NatureSweet policies or the law are violated
- *I* How to connect with resources to guide you in making the right decisions

### Who makes this commitment?

We all do. It applies to everyone who works for NatureSweet, including all associates, managers, executives, and members of the Board of Directors. It applies anywhere and everywhere we do business. And we expect suppliers and business partners to share in our commitment by living up to the standards of this Code and meeting the requirements of our Supplier Code of Conduct.

### What if a violation occurs?

Violations of our Code risk the integrity of our products, the safety of our workplace, and the trust of our customers and consumers. That is why we take violations seriously. When our Code or other policies are violated, disciplinary actions can follow, including potential termination. Some violations of the Code may also be unlawful and carry with them civil or criminal penalties for those involved, including NatureSweet as a whole. That's why it's important to know - and live up to - our Code.

## **NEED SOME HELP?**

Look for these tools throughout the Code:



Can We Talk? highlights common situations you might run into and how to handle them.



Keep Growing offers links to NatureSweet's policies and other key resources.



*NatureSweet's Ethics Hotline* provides a direct link to our hotline for you to report concerns.



## Can We Talk?

What if there is a conflict between our Code and industry practices?

Follow the Code, Our Code is written with our purpose of transforming the lives of agricultural workers in mind. Sometimes that means going beyond what is tolerated in other parts of our industry.











### What if there is a conflict between our Code and local laws?

This Code should be consistent with all relevant laws that apply to us. But we operate in many localities, and things can change quickly. If a conflict does arise, don't try to figure it out yourself. Contact our Legal Department for guidance.

## **OUR RESPONSIBILITIES**

NatureSweet's continued growth and success depends on each one of us doing our part.

## Associates

Everyone who works for NatureSweet has a responsibility to:

- ✓ Follow our Code, our policies, and the laws where we operate.
- ✓ Live by NatureSweet's Principles and contribute to our Purpose.
- Ask for help when challenges or conflicts arise.
- Stay alert for misconduct and speak up if you witness or suspect a violation.

## Leaders

All managers and executives carry the added responsibility to:

- ✓ Be a role model for their team by demonstrating integrity daily.
- Champion the Code by referring to it regularly and encouraging others to do the same.
- Listen to and support associates by creating an open and safe environment for them to speak up.
- Take immediate action and report any actual or suspected misconduct as soon as they learn of it.





## NATURESWE





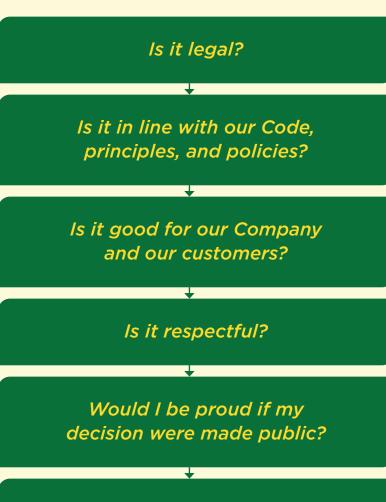




## HOW TO MAKE GOOD DECISIONS

### Our commitment to this Code is reflected in the decisions we make.

Integrity is about choices. Every day you get to make choices about how you do your job and how to conduct yourself in respectful and ethical ways. Hopefully, the right decision will be obvious most of the time. But complications do arise. If the right choice isn't obvious, ask yourself these questions about the action you're considering:



*Is it safe for people and the planet?* 

If you answered "yes" to every question, then it's probably a sound decision. If you answered "no" to one or more, reach out to one of our many available resources for guidance.











## **REPORTING CONCERNS**

### When something is wrong, we have a duty to make it right.

NatureSweet is stronger when everyone feels comfortable speaking up. When a violation occurs, reporting it is the first step in setting things right. If you know of or suspect a violation of the law, our Code, or our policies (even if you are not certain of all the facts), you should report it to one of the following resources:

## **Managers and Human Capital Department**

Your manager should be able to help you with most guestions or concerns and direct you to the Ethics Hotline if necessary. But if the issue involves them or you are uncomfortable discussing the issue with them, contact another manager or the Human Capital Department.

## Legal Department

Associates can report violations directly to NatureSweet's *Legal Department*, which can also offer guidance on issues including:

- Accounting or auditing irregularities
- Fraud, theft, bribery, and other corrupt business practices
- *Environmental, safety, and product* quality issues
- *Discrimination*. *harassment*. *and human* rights violations
- ✓ Conflicts of interest
- ✓ Other applicable legal requirements

## NatureSweet's Ethics Hotline

NatureSweet's Ethics Hotline is a confidential way to report known or suspected violations. You may report anonymously, where allowed by local law. Available 24 hours a day, seven days a week, the Ethics Hotline is staffed by third-party ethics and compliance specialists who will listen, ask questions, and report your concern to the Legal Department.

## **Next Steps**

NatureSweet takes all reports of violations seriously and will investigate them fully. If a violation of the Code, our policies, or the law is found to have occurred, we will take appropriate disciplinary action, up to and including dismissal. Certain violations may also result in legal action, penalties, or criminal prosecution.

## WHAT TO EXPECT WHEN YOU USE THE ETHICS HOTLINE

- Be prepared to provide as much detail as possible (who, what, where, and when).
- VatureSweet may need more information, so you will be assigned a report number that allows you to follow up on your case. This is especially important if you reported anonymously.
- ☑ Out of respect for privacy, NatureSweet will not be able to inform you of any disciplinary action taken.
- ☑ The Ethics Hotline is available to all associates, suppliers, and partners.

## A SHARED COMMITMENT Code of Conduct



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## HOW TO REACH THE ETHICS HOTLINE



### Online at naturesweet.ethicspoint.com

or



In Mexico, call 800-099-1708

In the US, call 844-939-3332







## We Do Not Tolerate Retaliation

NatureSweet does not retaliate against anyone who participates in an investigation or reports a violation or concern in good faith. "Good faith" means an honest and full report of all relevant information, regardless of whether your report uncovers actual misconduct.

If you believe you are the target of retaliation or have witnessed retaliation against someone else, report it immediately.

# COMMITTED TO EACHOTHER

Transforming the lives of agricultural workers starts with how we treat each other.

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A SHARED COMMITMENT Code of Conduct



## SAFETY, SECURITY, AND HEALTH

No business goal is ever worth risking the health and safety of our associates.

## **OUR COMMITMENT ...**

We create a workplace where everyone can feel safe and secure while doing their jobs. NatureSweet associates must comply with all the health and safety laws, policies, and procedures relevant to their work. Additionally, we should all routinely review and seek to improve workplace conditions and report any unsafe or unhealthy conditions immediately. We also expect associates to complete all safety trainings and use personal protective equipment as required.

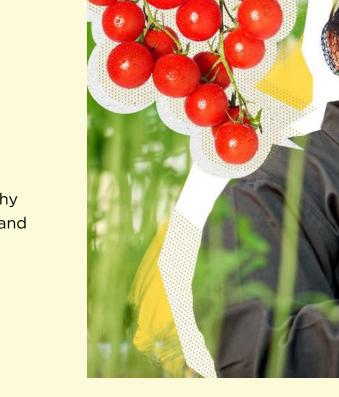
## **Other Ways to Keep Our Workplace Safe**

### **Drugs and Alcohol**

- Associates must never report to work under the influence of drugs or alcohol.
- NatureSweet does not tolerate the illegal use, possession, sale, conveyance, distribution, concealment, transportation, or manufacturing of drugs or drug paraphernalia in its facilities or operations.
- NatureSweet may search items on Company property, including offices, desks, computers, cars, and lockers at any time, where permitted by law.

### Workplace Violence

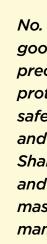
- Follow all security procedures for entering and exiting facilities and do not share security credentials.
- Weapons, firearms, ammunition, explosives, or dangerous flammable devices are not permitted inside Company facilities or vehicles or while engaged in offsite Company business. Some associates providing security services may carry weapons, but only in strict compliance with their duties and the law.
- Report any threats, weapons, unauthorized individuals, or suspicious behavior immediately.





## Can We Talk?

My job involves working with hazardous chemicals that require the use of high-grade protective masks. Today, our team ran out of those masks and my manager suggested we use storebought surgical masks until our regular supply is restocked. Should I do what she says?

















No. Our safety procedures exist for very good reasons and should be followed precisely. Using subpar personal protective equipment or ignoring proper safety procedures puts associates at risk and could put our Company at legal risk. Share your concerns with your manager, and if she insists on using surgical masks, report the incident to another manager or NatureSweet resource.

## **RESPECTFUL WORKPLACE**

Mutual respect is the soil from which a better kind of workplace grows.

## OUR COMMITMENT...

Together, we all work to promote a positive workplace and never allow or engage in any form of harassment, bullying, or intimidation. This includes verbal, physical, sexual, or other inappropriate behavior that targets another associate, client, vendor, or supplier, or creates a hostile work environment. If you know of or suspect harassment in the workplace, report it immediately. Remember, NatureSweet has a strong *Anti-Retaliation Policy* to protect anyone who reports a concern in good faith.



## Ca

## Can We Talk?

Two of my coworkers frequently quote sexually explicit jokes from a podcast they both listen to. The jokes are only directed at one another, but it's hard not to overhear them. Should I say something?

Yes. Regardless of who their comments are directed at, their behavior could create a hostile work environment for you and other associates. If you're comfortable raising the issue directly, you could ask them to stop. But if you aren't comfortable doing that, or the behavior continues, report it.

## Keep Growing

See our Complaint Process Policy





Inappropriate remarks, insults, gestures, or physical contact.



Jokes, comments or emails of a sexual, racial, or offensive nature.



Online behavior such as displaying inappropriate pictures, sending offensive messages, or engaging in hostile social media conduct toward fellow associates.



Sexual harassment, including repeated unwanted sexual advances or requests (which may or may not be dependent on favors or threats).

## •











## **DIVERSITY AND INCLUSION**

Every associate deserves to feel like they belong at NatureSweet.

## **OUR COMMITMENT ...**

All are welcome here. We believe the range of backgrounds, experiences, and beliefs represented in our workforce make us stronger as a Company and enhance our communities. NatureSweet is proud to be an equal opportunity employer with zero tolerance for discrimination based on race, religion, appearance, sexuality, gender, or other personal characteristics. We never engage in discriminatory practices and only consider job-related factors when making decisions about hiring, advancement, and compensation. Together, we all work to create a *respectful workplace* that celebrates diversity and welcomes new perspectives.

### Can We Talk?

I'm Japanese American and just started as a financial analyst. During a recent one-on-one my manager said, "You're doing a heck of a job! But I'm not surprised. Math must be in your DNA." I think he meant it as a compliment, but it still made me very uncomfortable. What should I do?

It doesn't matter what your manager intended, what he said was not OK. It's wrong for any manager or associate to engage in harmful stereotyping or bring up personal characteristics in assessing performance. You should report your manager's comments.

During a meeting to evaluate the final candidates for an open role on our team, another associate said we probably shouldn't hire one of them because "She just got married, so she'll probably be tied up with kids pretty soon." Is that OK?

It is not. Only job-related qualifications should be evaluated when making a hiring decision. Your coworker's comments could be considered discrimination based on gender, marital status, and pregnancy status. They are wrong and could open the Company up to legal risks. You should report the comments.

### What Traits Are Protected?

Certain protected characteristics may vary depending on local laws, but generally include:

🗹 Age	🗹 Medical conditi
Ancestry	☑ Military or
🗹 Gender	veteran status
🗹 Gender identity	National origin
or expression	Physical or
🗹 Genetic	mental disabilit
information	Pregnancy
🗹 Marital status	☑ Race

If you witness or suspect discrimination based on these or any other personal characteristics, report it.



4.1 Associate Handbook



CONTENT





## ✓ Religion Sex Sexual orientation

- Skin color
- Any other characteristic protected by law





# COMMITTED TO OUR CLIENTS

Whether it is the consumer preparing a fresh tomato sauce for dinner or the grocer seeking a higher quality of produce to stock their shelves, we always think of our customers.

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## **PRODUCT QUALITY AND SAFETY**

We stake our reputation on the quality of our produce.



## **OUR COMMITMENT ...**

With every bite, our consumers trust us to keep them healthy, nourished, and satisfied. That is why quality assurance is part of every associate's job. We follow all applicable health and safety laws, policies, standards, and procedures. We never misrepresent or mislead customers or consumers about the quality and cultivation of our cucumbers, peppers, and tomatoes. It's all part of our commitment to raising our produce the right way.

## How We Keep Our Produce Fresh and Safe



Follow all laws and internal policies regarding quality and safety.



Keep an eye out for health and safety violations and report them, even if they happen on another team.



Never lie, mislead, or misrepresent the process of how our produce is grown to regulators, customers, or the public.



Follow all sanitation guidelines and use personal protective equipment properly when required.



**Complete all** required trainings related to health, safety, and quality assurance.



Hold suppliers, vendors, and other third parties to the













same standards.



Never sacrifice quality or safety to meet a deadline. Raising produce right means not taking shortcuts.



## Keep Growing See our Occupational Health and Safety Policy

## FAIR AND HONEST COMPETITION

We best the competition with hard work and integrity, not unethical tricks.



### **OUR COMMITMENT...**

We believe in playing by the rules. Creating better, fresher, and smarter-packaged products is how we get a leg up on other growers. That's why NatureSweet associates never resort to illegal or improper activities such as *bribery*, slander, or spying to gain a market advantage. We obey all relevant antitrust and fair competition laws, and we never enter any agreements (formal or informal) to restrict trade or exclude competitors.

## What Does Anti-Competition Sound Like?

While talking with a competitor, did any of these topics come up?

- Pricing or product strategies
- Boycotts of clients, suppliers, or other competitors
- Setting prices
- **I** Division of markets or territories
- Interference with bidding processes
- Misinformation or dishonest claims about other companies

If any of these topics come up with a competitor, immediately stop the conversation by changing the topic or leaving altogether. If you suspect a violation has occurred, report it to the Legal Department.

## **Fact-Find the Right Way**

Knowing how our competitors operate helps us better understand the industry and the marketplace. But it's important to gather information ethically.

- Always respect the intellectual property rights and confidential information of others.
- ☑ Use only lawful, ethical, and publicly available sources when gathering information.
- ☑ Never deceive, lie, or misrepresent yourself to gain a competitive edge.
- ☑ Never offer bribes, favors, or inappropriate **gifts** to obtain information or a competitive advantage.













## **DATA PRIVACY**

Protect the data of others as you would your own.

## **OUR COMMITMENT ...**

We respect the privacy rights of our associates, clients, and partners. That's why NatureSweet is thoughtful and cautious about how we gather and collect personal information. We only collect and use the minimum amount of personal data needed to meet legitimate business needs. We never process personal data without consent or in violation of the law. And we handle information with care. Remember, the loss of personal data can have serious consequences for those involved and for our Company.



### Can We Talk?

I work in sales. A friend of mine works for a small craft beer company and asked if he could look at our customer information and lists to help generate leads. Since his company isn't a competitor of ours, is that OK?

## No, it is not. Our customer entrusts us with their data for the specific purpose

of doing business with NatureSweet. As someone who does not work for NatureSweet, your friend is not authorized to access this data and doesn't have a legitimate reason.



### What is Personal Data... ...And How Do We Protect It? Examples Include: ✓ Follow all NatureSweet guidelines and policies for protecting ✓ Names confidential information ✓ Addresses ✓ Only gather data that contributes to Email or IP addresses a legitimate business goal or task. Birth dates ✓ Only share personal data via secured networks and systems Phone numbers approved by NatureSweet. Location data ✓ Only share data with those who are authorized and have a need ✓ Health or benefits information to know. Bank or credit card information ✓ Do not leave personal data out in the open or in unsecure locations. ✓ Pay or performance information Do not discuss it in public areas Any other information that could be where you may be overheard. used to identify someone If you know of or suspect a breach or loss of data, report it immediately to



## Keep Growing

See our Information Security Policy

A SHARED COMMITMENT Code of Conduct





the IT department.







## **GLOBAL TRADE**

Playing by the rules lets us share our produce with the world.

## OUR COMMITMENT...

As an international company, we respect, value, and follow all trade laws and regulations as they apply to us. NatureSweet is committed to staying knowledgeable and up to date on these often complex and ever-changing laws, making sure we follow the rules of the countries both sending and receiving goods. We maintain *complete and accurate records* of all foreign transactions to prevent money laundering. Money laundering is an attempt to mask the proceeds of criminal activity as legitimate business revenues. And when the law is unclear or requirements seem to conflict, do not hesitate to consult with the Legal Department.



## Can We Talk?

On social media, there have been calls to boycott a grocery store chain we do business with. I am supposed to process another shipment to them soon. Should I cancel the order? No. NatureSweet does not participate in unsanctioned boycotts. However, if you have concerns about the integrity or standards of a NatureSweet client, vendor, or supplier, consult the Legal Department to determine how to proceed.



**International trade gets complicated fast.** If your work involves imports and exports, it's important you stay current on all applicable laws and regulations, including those related to:

### **Import and Customs Activities**

Laws ensuring accurate tariff classification, value, country of origin, product marking, and other elements.

### **Exports and Export Controls**

Laws regulating or restricting the export of items due to national security, foreign policy, anti-terrorism, or non-proliferation.

### **Trade Embargos and Economic Sanctions**

Laws prohibiting or restricting business dealings with certain countries or entities.

### Anti-Boycott

Laws prohibiting participation in unsanctioned boycotts or a refusal to trade with a specific country.



Keep Growing

See our Suspension Agreement Quarterly Report Process

NATURESWEET









# COMMITTED TO OUR COMPANY IIII

We are proud of the company we are growing and tend to it with the same diligence and care as our produce.

Tomataes

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A SHARED COMMITMENT Code of Conduct



## **CONFLICTS OF INTEREST**

We always make decisions in the best interest of NatureSweet.

## **OUR COMMITMENT ...**

Associates should never let outside financial concerns, personal relationships, or business opportunities interfere with their duties and obligations to NatureSweet. We all must recognize and avoid conflicts of interest that might cloud our professional judgment or cause others to question our commitment to NatureSweet. Associates should maintain a clear boundary between their personal life and work life. A conflict of interest exists when a person's outside interest interferes in any way with the interest of NatureSweet or creates the appearance of such interference. Associates should disclose any actual or potential conflict of interest or any appearance of a conflict of interest. Disclosures should be made promptly to your manager and Human Capital. This determination will be made by the Ethics Committee.



Can We Talk?

I've worked at NatureSweet for years. My sister's company was recently acquired by one of our vendors and now she works in a department I directly interact with. Is this a conflict of interest?

## **Identifying Conflicts of Interest**



Working a second job for a client, competitor, or a company that does (or is seeking to do) business with NatureSweet.



**Financial interest** such as investing in a client, supplier, or competitor.



Taking advantage of an outside opportunity that you learned about through your work at NatureSweet.



Being in a position to hire, promote, or directly supervise relatives or friends.



Taking advantage of NatureSweet's property, name, resources, or your position to reap personal or financial gain.





Possibly. Sometimes, even when you are careful, conflicts of interest can still happen. In such cases, it's best to disclose the conflict immediately so that it can be addressed and resolved.







Accepting a role as a board member, director, advisor, or officer that interferes with your work at NatureSweet.

## ACCURATE RECORDS AND ACCOUNTS

Maintaining clear and thorough records pays off in the long run.

## OUR COMMITMENT...

We keep track of the incredible work we do. From timecards to tax records to shipping information, we all have a responsibility to document our work accurately and truthfully. These records guide the decisions we make as a company. As NatureSweet associates, we never submit false or misleading entries or statements, omit required or relevant information, or otherwise tamper with or conceal official records. We also manage records with care, securely holding on to records for as long as NatureSweet needs them and in accordance with the law and our policies.

**Recordkeeping can be intimidating.** But keeping these tips in mind will help you stay on top of the records you create:

### Be Accurate

Make sure records you create are clear, complete, and timely.

### **Be Truthful**

Never falsify records or create misleading entries. And do not let anyone pressure you into falsifying records, regardless of their position.

### **Be Compliant**

Follow all policies and internal controls, as well as applicable laws, accounting practices, and regulations.

### **Be Organized**

Store records in a secure and organized manner. Hold onto them for as long as they are required, and never destroy any that have been requested as part of a lawsuit, investigation, or audit.

### **Be Alert**

Speak up immediately if you observe any suspicious activity or misconduct.



Can We Talk?

It's the start of a new financial quarter and my manager just asked me to change the date on an outgoing shipment. He wants me to date it as an order from last guarter because "that'll look better for us." Should I do what he says?





CONTENT

No. We always strive for accuracy and honesty in our records. Changing or altering records to misrepresent business performance is unethical and could even constitute fraud. You should report this request immediately.





## **COMPANY ASSETS**

Assets are the tools we use to get the job done - so we protect them.

## **OUR COMMITMENT ...**

We are careful with NatureSweet's assets. From greenhouse facilities to computer software and Company credit cards, we all depend on the tools and equipment provided by NatureSweet to do our work and do it the right way. As associates, we take care of Company resources, protecting them from loss, damage, theft, waste, and improper use.

## **Protecting Our Assets**

- ☑ Use Company assets for Company business. Occasional use for personal reasons is permitted but should never interfere with your job responsibilities.
- Never give away or sell assets without approval.
- ☑ Only use authorized software, devices, and procedures.
- **I** Remember that NatureSweet email accounts and information systems are Company property. We may review, view or inspect information contained on Company systems and equipment at any time, where permitted by law.
- ☑ Never use NatureSweet email, instant messaging, social media, or voicemail to verbally abuse, offend, or harass others.
- ☑ These policies apply regardless of where you conduct business. If you work from home or another remote location, we expect you to follow the same best practices.

## What Are Company Assets?

Our assets include a wide range of physical tools and intangible information. **Examples include:** 

**☑** Confidential

information

- ✓ Properties and facilities ✓ Intellectual property
- ✓ Tools and equipment
- Vehicles
- *☑* Inventory and supplies
- Financial resources
- ✓ Credit cards, checks, petty cash, and other funds

## **Tips for Safeguarding Computer Assets**





Files and documents

*Email and computer* networks



RESOURCE:





Be on the lookout for phishing scams or other attempts to access personal or Company information.



Never click on suspicious email links, even if you think you know the source.



## Keep Growing

See our Information Security Policy

## **CONFIDENTIAL INFORMATION**

We keep confidential information private.

## **OUR COMMITMENT...**

At NatureSweet, we have our own way of doing things, and we safeguard the confidential information, intellectual property, and trade secrets behind our methods. We do not release or share Company confidential information – especially nonpublic information that might be useful to competitors or harm NatureSweet or its clients if disclosed. We only share confidential information with authorized individuals who have a need to know as part of their work.

## What is Confidential Information...

- ✓ Trade secrets
- ✓ Contracts
- Personnel records
- Payroll information
- *I* Business plans and proposals

- Corporate structure details
- information
- Marketing and sales strategies or forecasts
- Client and pricing lists

- Construction and asset management plans
- Capacity and production Supplier data
  - Business leads
  - ✓ Research and development information



## ...And How Do We Protect It?

- ✓ Follow NatureSweet best practices around data privacy, Company assets, and responsible communication.
- ☑ Do not record conversations during meetings (regardless of whether they happen on public or private platforms) without Company consent.
- Remember that your duty to protect trade secrets, working methods, and competitive information continues even after your time at NatureSweet has ended.
- ☑ Do not seek or use improperly obtained information from third parties.
- ☑ Be aware that, to the extent not prohibited by law, any technological developments generated by associates or with Company assets are considered property of NatureSweet.
- ☑ Only use artificial intelligence (AI) tools that have been vetted and authorized by NatureSweet in keeping with our AI Policy.



## Can We Talk?

*My* daughter is preparing a science project for school about greenhouse cultivation. I was thinking of letting her look over an older research and development deck from work to gather some general information. Is that OK?

No, it is likely not OK. It's nice that you want to help your daughter, but we keep all research and development materials confidential (even if they are older or potentially out of date) to protect trade secrets and other vital information. If you are uncertain, always contact the Legal Department.



## Keep Growing

See our Information Security and AI Use Policy









## **RESPONSIBLE COMMUNICATION**

We are thoughtful about the messages we send out.



## **OUR COMMITMENT...**

NatureSweet's well-earned reputation is built on the quality of our produce, the uniqueness of our purpose and the integrity of our associates. But in the modern media environment, an off-handed comment or careless post can undo years of good will. That is why we communicate consistently, responsibly, and honestly, deferring all media requests to External Communications in the Marketing Department and exercising caution online. If you are an in a position to make speeches or media comments on behalf of the company, obtain written authorization first.



### Can We Talk?

Someone I know on social media has been sharing articles claiming that several companies, including NatureSweet, used GMOs with harmful health effects. I'm really tempted to post a reply saying I know first-hand from my work that this isn't true. Should I?

## **Communicating Online**

Social media posts and other online communications can take on a life of their own. Follow these best practices to stay in line with our purpose and principles.



Use good judgment and remember posts on any platform or app can last indefinitely.



Do not disclose confidential *information* about NatureSweet, our clients, suppliers, or vendors.



Never disparage *competitors* or make claims that cannot be backed up by hard facts.



Do not present yourself as a spokesperson or as someone speaking on behalf of NatureSweet.



Always be respectful and never engage in harassing, discriminatory, or abusive behavior online.







No, you should not. While it's frustrating to see this kind of misinformation spread online, you should never claim to speak on behalf of the company. If you see disinformation about our Company online or in the media, report it to External Communications and the Legal Department.









Always be helpful and truthful. Never mislead or make promises we cannot deliver.

## Keep Growing See our Social Media Business Use Policy

# COMMITTED TO DOING WHAT'S RIGHT \*\*\*\*

When it comes to doing the right thing, we aren't satisfied with the bare minimum. We choose to go above and beyond because we care.

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Interactions With Suppliers and Vendors	
Bribery and Corruption	
Government Partners	
Gifts and Entertainment	
Human Rights	



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## **INTERACTIONS WITH SUPPLIERS AND VENDORS**

Our business partnerships reflect our commitment to integrity and excellence.



**OUR COMMITMENT ...** 

We choose suppliers, vendors, and other partners who work like us and care like us. Beyond the products and services they provide, these companies must share NatureSweet's commitment to doing what's right. This is the kind of partnership that helps us thrive - one where everyone involved acts ethically, follows the law and our Code, and reflects our principles in their work.

## What About Misconduct?

Stay alert for any activity that might be violating our Code or the law, especially bribery, human rights abuses, or environmental violations. Report your concerns immediately to help prevent harm.

## **How To Ensure Ethical Partnerships**



Do thorough research to make sure suppliers and vendors are reputable and dependable.



Choose objectively, focusing only on NatureSweet's needs (such as price, products offered, quality, and record).



Never allow bias, discrimination, or *personal gain* to influence your choice.



Carefully follow our procurement practices.



Communicate with business partners about our Code and policies to help them comply.



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Monitor their work to ensure they are acting ethically and maintaining high standards.



## Keep Growing

See our Supplier Code of Conduct

## **BRIBERY AND CORRUPTION**

### Our integrity isn't for sale. We earn our success - we don't seek an unfair advantage.

## OUR COMMITMENT...

We take bribery and corruption seriously, and we won't stand for it anywhere in NatureSweet's operations. That means we know and follow the anti-bribery and anticorruption laws that apply to us around the world. We never offer or accept anything of value to improperly influence someone or gain some benefit, and we are especially careful with *government officials*, never offering them anything, whether a *gift or hospitality*.

## **Tips to Prevent Bribery**

- ✓ When it comes to bribes, follow this rule: Don't offer them and don't accept them.
- ✓ If an offer creates an obligation, avoid it.
- Clearly and transparently document all transactions.
- Never ask anyone to offer a bribe for you.
- ✓ If you see or suspect bribery or corruption anywhere in our business or supply chain, report your concerns immediately.



## What Is "Something of Value"?

It can include:

V	Cash or cash equivalents, like gift cards	V
V	Free products	
V	Lavish gifts, meals, or hospitality	
V	Stock	
	Kickbacks	V



## Can We Talk?

A supplier in another country bragged to me about "knowing how business gets done" in their country and paying special fees to get products through customs. Since I'm not the one bribing, can I ignore this?

>>>,

Keep Growing See our FCPA Policy



Facilitation payments to speed up government actions

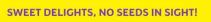
Special favors or offers of employment

Discounts not available to others

Charitable or political contributions

Payment of travel expenses

No, you shouldn't. If one of our suppliers or vendors offers a bribe on our behalf, NatureSweet could be held responsible. They act as an extension of our business and must follow the same rules. Report this activity immediately.





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## **GOVERNMENT PARTNERS**

Trust is the keystone of our business and our relationships, including with government partners.

## OUR COMMITMENT ...

Just as we hold ourselves to high standards, so do our government partners. We recognize our responsibility to fulfill our obligations to them and uphold the many laws and requirements that apply to NatureSweet. In every dealing with government officials, no matter where in the world we are working, we show integrity and follow all rules that apply. These rules can affect our bidding, invoicing, and billing processes, along with the way we conduct our accounting, purchasing, contracting, and employment activities.

### Some Ways You Can Build Trust



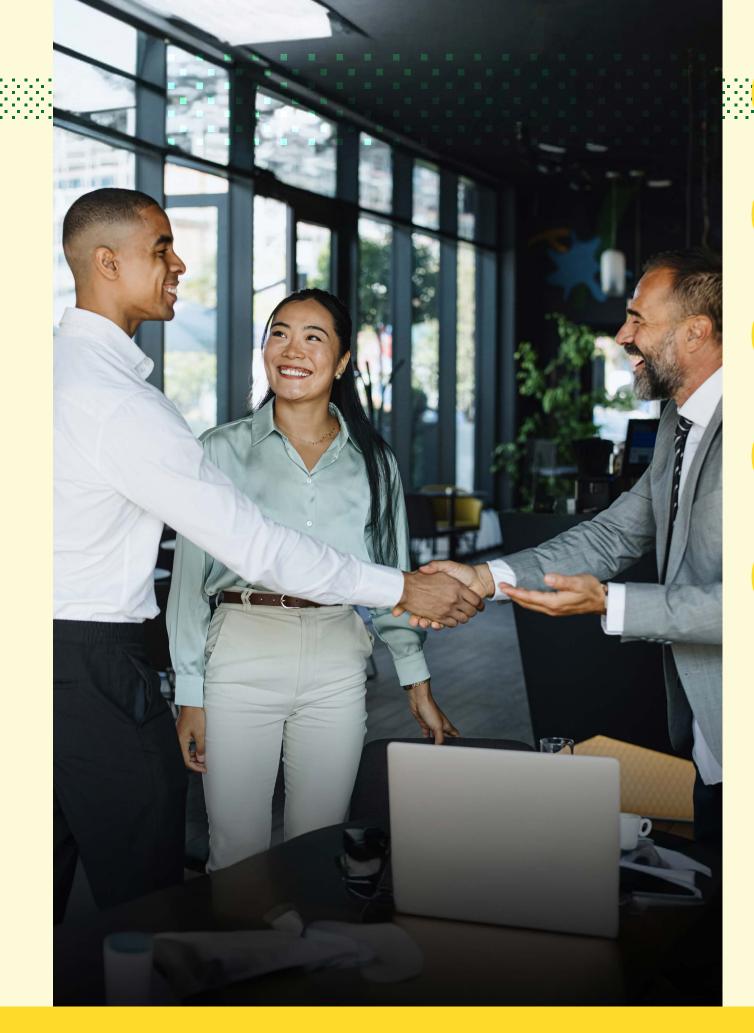
Focus on accuracy in every statement, report, or disclosure you make to government officials or agencies, including all <u>financial</u> and <u>environmental</u> disclosures. Also, follow all contract terms to the letter and <u>ask questions</u> if any requirement is unclear.



No matter what kind of government official you're dealing with (local, state, federal, or foreign), be honest in every interaction. Never try to *bribe* a government official or offer them anything of value. Remember, even the smallest <u>offers</u> are <u>prohibited</u>.



Carefully protect any classified or <u>confidential</u> <u>information,</u> <u>intellectual property</u>, or any other assets belonging to a government entity.











## **GIFTS AND ENTERTAINMENT**

Gift-giving, offers of entertainment, and other business courtesies can strengthen business relationships - but only when handled appropriately.

## **OUR COMMITMENT**

We are careful. We never want anything we give or accept to influence a business decision, create a *conflict of interest*, or suggest the appearance of a *bribe*. Before giving or receiving gifts or entertainment, know what's permitted by our policies and the policies of the other party's employer.



## What Does an Appropriate Gift Look Like?



Generally, it's:	Gen
☑ Nominal in value	×
✓ Offered only occasionally	×
Considered reasonable in a business setting	(
Given openly and recorded in our books and records	X
✓ Not tied to a business decision or action	/ ;
<ul> <li>Reasonable and consistent with local laws and industry standards</li> </ul>	
To be considered "appropriate," the offer must check ALL of these boxes.	×
Contraction of the second s	Only offe
	Ì





What Does an Inappropriate **Gift Look Like?** 

erally, it's:

Extravagant or lavish

In the form of cash or a cash equivalent, such as gift cards, loans, or stocks

Given in secret or "off the books"

Offered in exchange for preferential treatment or a favorable business decision

Sexually oriented, offensive or otherwise violates our commitment to a *respectful workplace* 

Given to or by a government official

v ONE check in ANY box means the er is "inappropriate."

## What If You're Not Sure?

Ask. Talk to your manager or the Legal Department before you act.









## HUMAN RIGHTS

Our job is to help nourish and feed the world. That work should never come at the expense of human life, health, dignity, or freedom.

## **OUR COMMITMENT...**

We respect and uphold human rights around the world. We seek to uplift and transform the lives of agricultural workers, so we follow all applicable labor and wage laws anywhere we do business. We never knowingly conduct business with any individual or company that participates in child labor, physical punishments, forced or prison labor, wage theft, or human trafficking.

## Ways We Can All Protect Human Rights



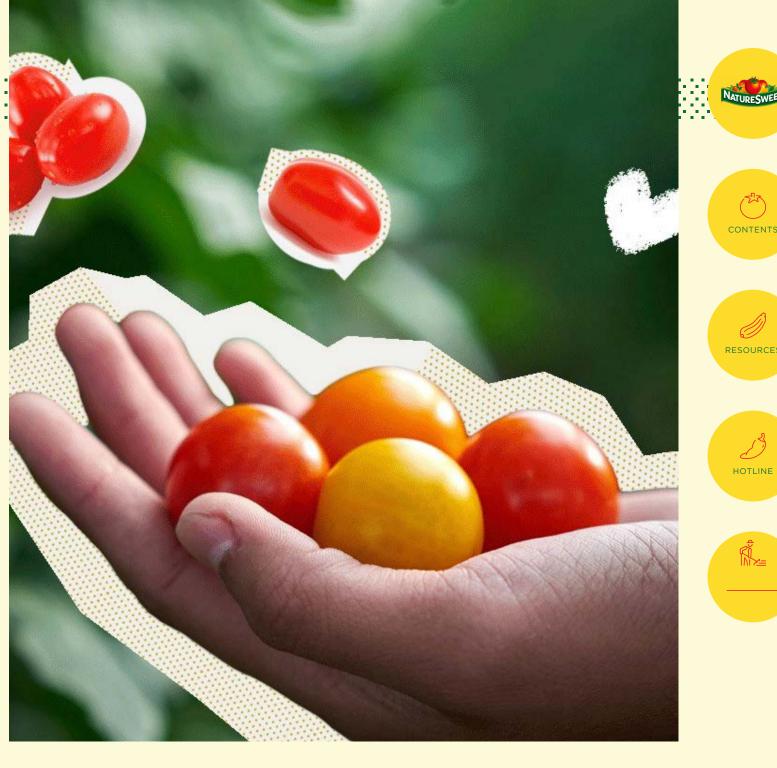
Speak up! If you see or suspect labor law violations or human rights abuses, raise them with your manager. If the conduct involves your manager or you don't feel comfortable talking with them about it, you can also contact the Human Capital Department or report anonymously to NatureSweet's **Ethics Hotline.** 



Hold our partners accountable. We pride ourselves on being able to uphold labor standards throughout the growing, packaging, and distribution of our products. And whenever we rely on outside suppliers and vendors, we hold them to the same standards. Report any potential violations by vendors, suppliers, or other partners.



Never work "off the clock." Hourly associates have a right to all the wages they have earned for all the hours they have worked. Report your hours accurately, take the meal and rest breaks you are entitled to, and make sure you receive overtime wages you've earned. Report any attempts to "dock pay," deny breaks, or force unpaid overtime.





Can We Talk?

During a recent visit to one of our suppliers, I saw an employee being called out for showing up late to work. The manager said the employee would have to stay late and make up the time without pay. Should I say something?

Yes. Regardless of what the employee did, unpaid labor is illegal and never an acceptable form of discipline. NatureSweet has zero tolerance for unpaid labor within our own Company and our supply chain. Report the incident immediately.

# COMMITTED TO OUR WORLD

When we transform the lives of agricultural workers in North America, we change the world for the better.

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Environmental Protection	
Community Involvement	
Political Activities	





## **ENVIRONMENTAL PROTECTION**

We prioritize sustainability for the good of our business and the good of our planet.

## **OUR COMMITMENT ...**

Our planet provides the raw materials and resources we need to grow our produce, so we take care of the planet in return. We go above and beyond what is required, as evidenced by our B Corp Certification, and use cutting-edge fertilization and irrigation techniques that minimize waste and environmental run-off. It is up to all of us, as associates and citizens of the world, to ensure we continue to meet and exceed our already-high standards for environmental protection.

## Keep the Environment as Fresh as Our Tomatoes

- ☑ Do your part to conserve, recycle, or re-use resources and reduce emissions in the course of your work.
- *I* Follow all applicable environmental laws that apply to us, wherever we operate. Know how these regulations apply to your job and complete all required trainings.
- Seek opportunities to lessen the environmental impact of our work and improve the sustainability of our processes, and share them with our Company.
- Make sure all supplies are sourced sustainably and hold our suppliers and vendors accountable to help protect our planet.
- If you see or suspect environmental hazards or violations, report them immediately.



## **How We Hold Ourselves Accountable**

NatureSweet stands by its commitments. Every year, we put out a Sustainability Report detailing all the work we do on environmental stewardship, community support, diversity and inclusion, human rights, and ethics and compliance initiatives. We encourage you to read this report to gain a better understanding of how the work we do connects with our principles.



## Can We Talk?

One of our suppliers has been in the news recently over claims of illegal wastewater dumping. I don't work directly with this supplier though, so is it worth bringing up?



Keep Growing See our Sustainability and ESG Policy

A SHARED COMMITMENT Code of Conduct









Yes, it is. We hold our suppliers and vendors accountable to help protect our planet. Share this information with your manager or the Legal Department so we can investigate the claims and, if necessary, terminate the relationship.



## **COMMUNITY INVOLVEMENT**

We are a force for good in our communities.



## **OUR COMMITMENT...**

Transforming the lives of agricultural workers means transforming communities as well. As a Company, NatureSweet is proud to lead social impact programs aimed at alleviating hunger, improving community health and wellbeing, increasing access to education and economic growth, and reducing overall inequality. And we encourage all associates to take an active role in lifting their communities, whether through NatureSweet-led initiatives or their own activities.



## **Giving Back Responsibly**



Seek out volunteer opportunities so we can meet our annual commitment to making a positive impact in our communities.



**Obtain necessary** approval before making any charitable contributions on behalf of NatureSweet.



Make sure personal volunteer activities occur on your own time and do not interfere with work.



Never solicit or give donations in return for payment, gifts, or favorable professional treatment.











Do not solicit fellow associates through mass email or pressure them to participate or donate to any cause.



## See our Programs of Corporate Social Impact

## **POLITICAL ACTIVITIES**

We do not let politics divide us.



## **OUR COMMITMENT ...**

At NatureSweet, we encourage our associates to be politically engaged and participate in causes they are passionate about. It's another way for us to shape our communities. But it's important to participate in political activities responsibly. Associates should never harass others for their political beliefs, force their own political views onto others in the workplace, or undertake political activities or give contributions on behalf of NatureSweet.

## **Tips for Political Involvement**



Make sure your political views and activities do not represent those of NatureSweet.



Undertake political activities and campaigning on your own time, outside of work.



Do not use any NatureSweet funds or assets to advance a personal political cause or interest.



Do not pressure coworkers to volunteer or contribute toward your political activities.



## Can We Talk?

On nights and weekends, I have been volunteering for a local candidate. Would it be all right for me to pass out campaign literature to coworkers during my shift?









No. While it's great that you're supporting a cause that's important to you, distributing campaign materials while at work might make other associates feel uncomfortable. It's best to leave campaigning for your off hours.

## LOOKING AHEAD

Thank you for reading this Code and gaining a better understanding of NatureSweet's purpose and principles. Our hope is that you feel more connected to our **Shared Commitment** and knowledgeable of the many resources available to you.

Whether your time at NatureSweet is just beginning or you have been with us for years, we hope you'll return to this Code whenever you feel lost or uncertain. One of the most satisfying parts of life at NatureSweet is getting to see the literal fruits of your labor grow and ripen. But we grow so much more than tomatoes, peppers, and cucumbers. When we follow our Code, we grow a company we can be proud of and share its bounty with our families and communities.











## **HELPFUL RESOURCES**

### If you ever need guidance, these NatureSweet resources are here to help:

ISSUES OR CONCERNS	CONTACT
To ask questions, speak up about potential misconduct or other ethical concerns	<ul> <li>Your manager</li> <li>Any other manager</li> <li>Human Capital</li> <li>Legal Department</li> <li>Or contact NatureSweet's Ethics Hotline:</li> <li>Available 24 hours a day, 7 days a week</li> <li>Visit <i>naturesweet.ethicspoint.com</i> to file a report or find the toll-free telephone number for your region.</li> </ul>
For information about Company benefits	Human Capital
For questions about our policies or the law	Legal Department
For media inquiries	External Communications in the Marketing Department
For environmental and sustainability questions	Environmental Manager Sustainability and Social Impact Director
For questions about marketing or promotions	Marketing Department



NatureSweet reserves the right to modify this Code at any time, as necessary, along with our policies, procedures, and conditions of employment. The Code is not intended as a contract or guarantee of employment.

No waiver of this Code may be made for a member of our Board of Directors or an executive officer without the written consent of our Board of Directors.



NatureSweet also supports an associate's right to speak out about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards, and safety issues.







