

# *Code of Ethics*

## **ANECOOP GROUP**

### *Our Values*

*Transparency & Trust, Participation & Cooperation*

*Shared Responsibility & Commitment*

*Talent & Inclusion*

## CONTENTS

<b>Introduction .....</b>	<b>3</b>
<b>1. Mission and Vision .....</b>	<b>4</b>
<b>2. Our Values .....</b>	<b>5</b>
2.1 Transparency & Trust	
2.2 Participation & Cooperation	
2.3 Shared Responsibility & Commitment	
2.4 Talent & Inclusion	
<b>3. Our Conduct.....</b>	<b>6</b>
	<i>Transparency &amp; Trust</i>
3.1 Ethics and Compliance.....	6
3.2 Integrity, Transparency and Combating Corruption .....	7
3.3 Confidentiality, Privacy and Data Protection .....	9
3.4 Information Security and Cybersecurity .....	10
3.5 Intellectual and Industrial Property .....	10
3.6 Good Corporate Governance Practices .....	10
3.7 Whistleblower Channel.....	12
3.8 Ethical Decisions .....	12
	<i>Participation &amp; Cooperation</i>
3.9 Cooperativism .....	13
3.10 Dialogue.....	13
3.11 Teamwork.....	16
3.12 Innovation and Knowledge Transfer .....	16
	<i>Shared responsibility &amp; Commitment</i>
3.13 Environment .....	17
3.14 Due Diligence in our Supply Chain .....	17
3.15 Food Quality and Safety .....	21
3.16 Management Efficacy and Efficiency .....	22
	<i>Talent &amp; Inclusion</i>
3.17 Labour Practices and Human Rights .....	23
3.18 Health and Safety.....	23
3.19 Quality Employment.....	24
3.20 Human Capital Development .....	26
<b>4. Our Commitment.....</b>	<b>27</b>
4.1 Corporate Social Responsibility Report.....	27
4.2 Ethics Committee .....	27
4.3 Ethics Hotline.....	28

## INTRODUCTION

### Commitment of the Governing Board and Management

This Code of Ethics brings together our principles, values and ethical standards of action and is a **GUIDE TO CONDUCT** for the people who make up the Anecoop Group, our employees, managers and members of the Governing Board, and also where applicable for the people in our “value chain” (members, suppliers and customers) and other stakeholders along with individuals and legal entities that have a business or professional relationship with the Anecoop Group.

The Code of Ethics is the Anecoop Group’s commitment to responsible professional behaviour and respect for people. It aims to foster a culture of ethics and regulatory compliance which supports decision-making in our organisation. <https://anecoop.com/en/about/philosophy/>

Business ethics is an essential part of our company. It helps to make prudent and fair decisions and contributes towards building “a decent society” in which fundamental values such as justice, fairness, respect, tolerance and solidarity prevail. The important thing is not to get there but rather to “*do it right*”.

As a social economy enterprise, the Anecoop Group seeks to forge relationships anchored in solidarity and trust, integration and distributive justice. **Anecoop is “a company of people, for people”**. We seek to meet the needs of the people who make up our cooperative group by enhancing their economic and social wellbeing as well as the sustainable development of local communities.

In our everyday operations we always keep in mind our Mission, Vision, Values and Goals, i.e. what we are, where we are going, how we do things and what we seek to achieve. Our Corporate Social Responsibility principles define our strategy and are the mainstay of our business operations.

We are fully engaged with sustainability, addressing all its dimensions, i.e., environmental, social and good governance, as well as economic sustainability. We draw on ESG (environmental, social and governance) criteria to evaluate our performance. Anecoop is committed to the Sustainable Development Goals (SDGs) of the 2030 Agenda to achieve equality, environmental protection and ensure prosperity, and also to the Ten Principles of the Global Compact to which we are a signatory.

We are **committed** to this and expect everyone in the Anecoop Group to share this commitment.

Approved by Alejandro Monzón, Chairman of Anecoop S. Coop., on behalf of the Governing Board of Anecoop S. Coop

6 November 2024

## 1. MISSION AND VISION

Anecoop's corporate policy aims to cater for the demands and satisfy the needs of our members, partners, customers and employees.

We pride ourselves on the excellent quality of our produce which complies with the specifications our customers demand, such as food safety, quality, legislation, authenticity and sustainability (in its three dimensions: environmental, social and good governance).

Anecoop's **Mission** is:

- **Members.** To maximise profitability and sustainability for members and growers.
- **Customers and Suppliers.** To build a mutually beneficial relationship with our customers and suppliers based on cooperation.
- **People.** To promote the personal and professional development of our people.
- **Society.** To achieve consumer satisfaction through a wide range of healthy, sustainable products.

Anecoop's **Vision** is to lead the fruit and vegetable sector in Europe through active member participation and the development of a sustainable agricultural model, establishing mutually beneficial alliances with members and customers and deploying management excellence based on quality, innovation and the promotion of talent.

## 2. OUR VALUES

### 2.1 Transparency & Trust

- Integrity and the fight against corruption and bribery in all its forms are core goals.
- The Anecoop Group is committed to good corporate governance, fostering a culture of transparency and honesty in its business operations as well as managerial best practice.

### 2.2 Participation & Cooperation

- We are all in this together. That is why Anecoop's success is the success of all its members and growers.
- We aim to build mutually profitable, long-lasting partnerships by supplying the right products to our customers.
- We build reciprocally advantageous relationships.
- We improve processes and generate synergies.
- We respect people and go further together, prioritising team success and wellbeing.
- Our behaviour has a positive impact.

### 2.3 Shared Responsibility & Commitment

- We share the same objectives and pursue them out of a profound commitment to agriculture and its future.
- We are committed to food quality and safety above all else.
- We consolidate and strengthen cooperativism based on the utmost respect for our suppliers.
- Our people are committed to the same objectives as our members, customers and suppliers and, above all, they act with integrity.
- We are committed to consumer health and the development of a sustainable economy.

### 2.4 Talent & Inclusion

- We advocate team-based projects involving our members and customers.
- We share knowledge and move forward together.
- We never stop learning and encourage the diversity of backgrounds and opinions.
- We always choose the right way of doing things.

### 3. OUR CONDUCT

Anchored in our Values, our **minimum standards** of behaviour are set out below with the following **scope of application**:

- **Employees, managers** and members of the Anecoop Group's **Governing Board**
- **Supply chain** (members, suppliers and customers) and other stakeholders along with individuals or legal entities that have business or professional relations with Anecoop.

#### *Transparency & Trust*

### 3.1 Ethics and Compliance

A culture of ethics and compliance is an intrinsic part of the Anecoop Group's management policies. The Group is committed to complying with national and international laws, regulations, principles and ethical standards for socially responsible companies. Cooperative values and principles guide the Anecoop Group's performance, thus building an ethical, responsible and sustainable business environment.

The Anecoop Group is committed to compliance with intergovernmental instruments including the UN Global Compact and Sustainable Development Goals (SDGs); the International Labour Organisation (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises; the Paris Agreement of the UN Framework Convention on Climate Change; the UN Guiding Principles on Business and Human Rights; the UN International Bill of Human Rights, and the EU Code of Conduct on Responsible Food Business and Marketing Practices.

Under the guidance of the Legal Department and the People and Talent Department, the organisation's departments **implement policies and draw up procedures and actions** to ensure compliance, all of which are supervised by the **control bodies**, i.e., our Technical Committees and the Governing Board, which meet on a monthly basis, and the Management Committee, which meets every fortnight.

#### *What do we expect from them?*

- ✎ We expect employees, managers and members of the Anecoop Group's Governing Board together with our value chain to comply with the legislation applicable to their area of work and the "Code of Ethics".
- ✎ We expect a commitment to acting ethically and responsibly to ensure their daily actions do not harm the Group's reputation and image.
- ✎ We expect them to be aware that we are all "the company".

### 3.2 Integrity, Transparency and Combating Corruption

Our commitment to integrity, which means honesty, consistency and ethical decision-making, is crucial to the Anecoop Group. It entails doing the right thing without straying from established principles and values.

The Group is committed to transparency, openness and accessibility to information. We provide clear and easy-to-understand insights to ensure the public can see how decisions are made which, in turn, fosters trust and accountability.

As a United Nations Global Compact signatory, the Anecoop Group is committed to complying with the Compact's Ten Principles, including the tenth: ***“Businesses should work against corruption in all its forms, including extortion and bribery”***.

The purpose of this model is to make sure that all employees, managers and members of the Governing Board perform their duties responsibly, diligently and transparently while also implementing an appropriate control system to identify and prevent compliance risks. Ethical behaviour and combating corruption are key principles of our model. This is why we encourage staff to act with integrity and impartiality in decision-making and in dealings with third parties.

#### **Conflicts of interest**

- No employee or manager may use their position in the Anecoop Group to obtain financial or personal advantage or business opportunities for themselves or for third parties.
- No employee or manager may intervene or take part in internal or external meetings at which decisions are discussed that may directly or indirectly entail a conflict of interest for a person who may also have access to confidential information affecting this conflict of interest.
- Members are expected to avoid situations which could lead to a potential conflict between their personal interests and those of the Anecoop Group pursuant to Spain's Cooperatives Law 27/1999 of 16 July 1999 and our Articles of Association. They are thus required to abstain from representing the Group and from intervening in or influencing decision-making in which they themselves or a third-party associated with them may have a direct or indirect personal interest.

#### **Corporate policy on gifts, presents and hospitality**

- Group employees and managers are to refrain from directly or indirectly offering, giving, soliciting or accepting gifts, favours or compensation (including entertainment or leisure activities) which may influence any decision-making process connected to the performance of duties arising from their position, unless these are of negligible value. The Group will ensure that the line between courtesy and a purportedly wrongful action is not crossed.
- Giving or receiving gifts in cash, regardless of the amount involved, is expressly forbidden.

- Accepting invitations (restaurants, shows, sports events, etc.) is permitted as long as it is related to the business, while in other cases it must be brought to the attention of the head of department or line manager who will assess whether accepting the invitation is appropriate. The Ethics Committee must be consulted in case of uncertainty.
- Any gift or gratuity received in breach of this Code must be immediately returned and/or reported to the head of department or line manager and to the Ethics Committee.

### **Corporate anti-money laundering policy**

Although we are not an undertaking regulated by Spain's Prevention of Money Laundering and Terrorist Financing Law 10/2010 of 28 April, we do have supervisory and control measures in place, especially on the countries of origin of money and ownership of accounts.

- A Proof of Account Ownership certificate is required as a prerequisite for any bank transfer.
- Money transfers from an unknown source are not accepted. If any such transfer is made, it will be returned immediately.
- Cash is not accepted above the statutory maximum amount.

### **Anti-competitive practices**

We are required to operate in accordance with the principles of fair competition and reject any anti-competitive practices and any behaviour which may constitute an abuse of a dominant position. We also undertake to compete fairly and ethically under the framework of antitrust laws and in compliance with the national and international competition rules within which we operate.

### **Responsible sourcing and procurement**

#### Service procurement and contracting processes

- They are to be conducted in compliance with the Anecoop Group's **Responsible Procurement and Sourcing Policy**. It includes the aspects of our CSR aimed at averting or mitigating any adverse environmental, social and economic impacts associated with purchasing goods and services anchored in responsible and sustainable management while also ensuring the generation of value and benefits not only for the Anecoop Group but also for society, the economy and the environment.
- The Group undertakes to make sure that the principles of ethics and integrity, equal opportunities and free competition, transparency and traceability, independence and objectivity in decision-making are upheld.
- The Group may only contract purchases of goods or the provision of services with relatives or acquaintances of employees or managers when they compete under the same conditions as other suppliers offering similar goods and/or services on the market (by way of example but not limitation, preference will be given to quality, professionalism and price). We believe that competition under equal conditions, and provided that there is due transparency in the management of any potential conflict of interest, precludes it from being construed as an instance of cronyism or favouritism. Otherwise, it would be a breach of this Code of Ethics.



### Goods procurement processes:

- The Group's relationship with its members and suppliers is to be lawful, respectful, transparent and ethical.
- Employees who perform commercial duties for the procurement of goods covered by our business operations are expected to deal with members and third-party suppliers impartially and without any favouritism.
- The choice of a member/supplier to serve a particular country or customer is to be based on objective, verifiable and reasoned grounds (by way of example but not limitation, quality, service and compliance). The decision may never be discriminatory.
- No employee or manager may ask for gifts or gratuities, favours or compensation as a condition for the continuation of a business relationship or threaten to break it off.

### **How we behave with government**

- No employee or manager may offer gifts, favours or compensation in cash or in kind to a public official to persuade them to refrain from or perform acts in breach of their duties for the purpose of gaining an advantage or benefit. Such conduct may constitute a bribery offence.
- Courtesy or protocol gifts are not in breach of this Code when they are not unreasonable in value or involve preferential treatment in return, for example sending presents, especially at Christmas, which will normally consist of cooperative products (fruit and vegetables, wine, merchandising).

### **3.3 Confidentiality, Privacy and Data Protection**

- The Group undertakes to ensure the confidentiality of information, the obligation to maintain privacy and the secrecy of sensitive information and only allow authorised staff to access it.
- The Group undertakes to ensure the privacy and data protection of all its stakeholders and other people who have a professional relationship with Anecoop pursuant to the General Data Protection Regulation (GDPR), Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and Spain's Personal Data Protection and Digital Rights Law 3/2018 of 5 December. Our "**Privacy Policy**" is available at [www.anecoop.com](http://www.anecoop.com) in "Disclaimer". You can exercise your rights by emailing our data protection officer at [responsable.privacidad@anecoop.com](mailto:responsable.privacidad@anecoop.com) or writing to them at Calle Monforte, 1 – Entresuelo, 46010 Valencia, Spain.
- The Group can demonstrate that appropriate measures have been put in place to comply with Data Protection Regulation obligations together with proof that these measures are working properly. Our way of demonstrating or proving compliance with the security principles is based on the internal documentation generated and on evidence. together with our biannual compliance reports. The internal documentation generated includes internal procedures and protocols, information clauses, data processor contracts, records of processing activities, data protection impact assessments and risk analysis.

### 3.4 Information Security and Cybersecurity

The cornerstones of information security are confidentiality, availability and integrity. We undertake to protect all types of confidential information gathered, processed or stored both physically and digitally at Anecoop, including third-party data from business partners, customers and employees. Anecoop's information security undertaking is set out in its "**Information Security Policy**" and "**Policy on the Secure Use of Resources**", a compilation of rules, guidelines and procedures to protect information against security threats and risks which is given to each new employee and posted on our Intranet.

### 3.5 Intellectual and Industrial Property

Compliance with ethical principles in intellectual property involves recognising and respecting the authorship of works and ensuring that the rights of creators are protected and upheld.

Likewise, in protecting industrial property the Code of Ethics seeks to avoid unfair practices such as improper imitation or misuse of trademarks and trade secrets.

The people bound by this Code of Ethics are required to respect copyrights and trademarks and to refrain from piracy, counterfeiting and unauthorised use of intellectual and industrial works.

### 3.6 Good Corporate Governance Practices

The Anecoop Group is committed to the Organisation for Economic Cooperation and Development (OECD) and G20 Principles of Corporate Governance fostering transparency, accountability and fairness.

**Principles of Good Governance** are instrumental in ensuring responsible business management, protection of members' interests and the long-term sustainability of companies:

- Respect for human rights.
- Transparency: disclosure of financial and non-financial information. The Group provides clear and complete information to enable members and other stakeholders to make informed decisions.
- Accountability: effective management, risk management and strategic decision-making oversight.
- Equality: seeking to ensure that benefits are shared equally among all members. This involves treating all stakeholders fairly and equitably without unfair privileges.
- Independence: senior management and members of the Governing Board are expected to act impartially, avoid conflicts of interest and ensure that all decisions are made for the common good of the company and its stakeholders.

The Anecoop Group is committed to the **Ten Rules of Good Management Practices**:

1. **Delegation**. Anecoop managers are to encourage and promote the professional development of their colleagues by delegating tasks and responsibilities to them and

- giving them the authority and independence required to perform the tasks entrusted to them.
2. Communication. Anecoop managers shall be transparent, loyal and flexible in **conveying information to their team**, whether through personal and direct communication or via the organisation's formal communication channels. Likewise, they must encourage bottom-up communication, enabling their team to participate, and actively listening to their feedback.
  3. Team management. Anecoop managers shall **lead their teams** by fostering teamwork, trust, commitment and collaboration among its members, steering them towards Anecoop's common objectives and values.
  4. Motivating people. Managers must **motivate** their colleagues, encouraging them to be enthusiastic about and engaged in the Anecoop project. Managers' self-motivation is a key factor in nurturing and transmitting a favourable climate to their colleagues.
  5. Strategic vision and change management. Anecoop managers must have and convey a global business and strategic vision of their work to their teams over and above their area of responsibility. They must also **lead change** across all levels and divisions of the organisation, helping their teams to tackle problems and adapt to change.
  6. Oversight and control. Anecoop managers are responsible for their team's performance and achievements and are therefore required to conduct regular and constant **monitoring**, analysing any discrepancies and putting forward any necessary corrective measures.
  7. Excellence at work and continuous improvement. Anecoop managers shall operate according to established work procedures and Anecoop's values while fostering **continuous improvement** in their work and the work of their teams and ensuring its **excellence** and quality.
  8. Conflict management. Anecoop managers must ensure balance, understanding and consensus in their team and in Anecoop. Managers should anticipate conflicts, but when they do occur, they must take decisions to resolve them.
  9. Professional role model. Anecoop managers shall be **professional role models** in their area of specialisation both for their colleagues and also for the wider community and the industry as a whole. They shall keep up to date with the latest developments in their area of knowledge and share and publicise them among their colleagues.
  10. Results orientation and decision-making. Managers must prioritise achieving goals by planning and organising their teams, optimising available resources and **making the necessary decisions** in line with Anecoop's strategy.

### 3.7 Whistleblower Channel

We have a [Whistleblower Channel](#) in place under Spain's Law 2/2023 of 20 February on the protection of people who report regulatory violations and the fight against corruption. This is available to everyone on Anecoop's website [www.anecoop.com](http://www.anecoop.com) and on our Intranet. This can be used to anonymously or confidentially bring to the Group's attention any serious criminal and administrative offences of which people become aware in the course of their work.

### 3.8 Ethical decisions

We advocate making decisions on the basis of the Golden Rule: *“Do unto others as you would have them do unto you”*.

Everyone in the organisation should ask themselves the following questions when they have to make a decision:

Is it legal? Is it fair? Would it breach the Code of Ethics? Is it in line with my personal value and those of the company? How would I feel if everyone knew about it; proud or ashamed? Would I want it to be made public? Does it benefit or harm the company?

If there is uncertainty about the ethical implications of a decision, everyone in the organisation should consider these ten recommendations:

1. **Take time to think.** This will help you not to make hasty decisions and analyse the context and your options.
2. **Define your goals clearly.** If you know what you want and don't want, you will be able to make decisions which do not affect your purposes.
3. **Review what you know and what you need to know.** Base this on real facts and not assumptions.
4. **Make a list of options.** Scrutinise the facts to identify your options and pick the best one.
5. **Think about the consequences.** Once you know what your options are, assess whether they go against any of your values and what this may lead to.
6. **Identify who your decision may affect.** Your decisions can often affect others so it is important that you also consider the people around you.
7. **Seek help or advice.** If you are still not sure, check with someone whose judgement you respect and value or think of someone you admire and ask yourself what they would do in your position. This will give you another perspective on the situation.
8. **Think about how you feel about the decision you have made.** Do you feel proud of and comfortable with your choice?
9. **Follow the “Golden Rule”.** Do unto others as you would have them do unto you.
10. **Review the consequences of your decisions.** Did they have the expected outcome? Did they lead to unexpected consequences? Learn from the outcome and make future decisions based on what you have learned.

### 3.9 Cooperativism

The Anecoop Group is committed to enhancing the cooperative movement in business and economic terms by undertaking initiatives which complement and drive production and resource use.

Cooperativism reconciles business efficacy (efficiency, competitiveness and sustainability; resource optimisation, innovation and profit-making capabilities) with cooperative values and principles. **Our cooperative model** dovetails seamlessly with the social demand for enterprises and organisations which are a lever for growth in sustainability and community engagement.

#### *What we do...*

- We promote and support the integration of our members in all their forms to contribute to the efficient use of resources and business sustainability.
- We foster digital transformation and the increasing use of technology in our operations to achieve sustainable agriculture.
- We seek IT integration of Anecoop and its members.
- We support actions in line with the Sustainable Development Goals (SDGs) together with our members.
- We encourage people to eat fruit and vegetables through robust marketing and advertising campaigns and by attending domestic and international trade fairs.
- We promote quality produce grown using environmentally friendly methods.
- We conduct initiatives that support generational renewal in agriculture and prevent farms from going out of business because they are unprofitable.
- We take part in member events which help to build trust.
- We share information, knowledge transfer and the results of R&D and innovation projects.
- We encourage training.
- We support financing for projects such as land purchase and renewable energies.

### 3.10 Dialogue

The Anecoop Group is committed to ongoing dialogue with its stakeholders (members, employees, customers and society). We believe that active listening, respect, empathy, tolerance and honesty are essential principles which guide ethical and constructive dialogue.

We encourage dialogue through a range of **communication channels**.

#### *With employees...*

- Our “En Contacto” news releases. This is the tool through which Anecoop’s management shares information about company events, how the year is going, whether targets are being met and the cooperative’s results.

- **Intranet.** It includes corporate documentation, policies and newsletters, the training courses and institutional events calendar, links to corporate software, communications and news from the organisation and more.
- **Employee Web and SESAME HR management tool.** This enables every employee to manage the details of their job in Anecoop (personal details, salary-related aspects, holidays) together with the People and Talent Department.
- **Internal news releases.** This channel is used to inform staff about relevant issues in the different departments, such as new faces and people leaving the organisation, internal job promotions, the launch of media campaigns, corporate policies, etc.
- **Whistleblower Channel.** Our own channel available to everyone on Anecoop's website [www.anecoop.com](http://www.anecoop.com) and on our Intranet. This can be used to anonymously or confidentially bring to the Group's attention any serious criminal and administrative offences of which people become aware in the course of their work.
- **Works Committee.** The Committee has an online suggestions box for employees to ask questions or make suggestions or recommendations by emailing [comiteempresa@anecoop.com](mailto:comiteempresa@anecoop.com). These are subsequently passed on to the People and Talent Department and the Managing Director.
- **Strategic sessions.** Anecoop staff are also actively engaged in strategic and product sessions held with members, thus helping to enhance relations between the organisation and its social base.

### **With members...**

- We foster close personal relationships, mutually nurturing the **exchange of information** to learn about their needs and projects and involve them in ours.
- We use a CRM (Customer Relationship Management) programme to obtain all of the relevant business information about our members and products.
- We coordinate **strategic, technical and informative initiatives** across the organisation complementing our day-to-day contact.
- **We organise visits** from cooperatives and organisations associated with Anecoop to our experimental field stations in Valencia and Almeria.
- We support and take part in major corporate events organised by our members.
- Campaign newsletter: monthly newsletter hosted on the Intranet and sent to our members (in hardcopy and digital versions).

### **With customers...**

Communication with our customers is continuous and transparent.

- We apply this policy in our routine management, providing information about products, services, regulations, certifications and all aspects of our professional relationship with each customer.
- We have a CRM (Customer Relationship Management) system in place to centralise all the commercial information about our customers, suppliers and products.
- We organise tailored visits and product presentation events for customers in addition to the ones we hold for sales teams so that they can share this information with their customers.

### *With society...*

Our corporate behaviour has a direct impact on our surroundings. We have a responsibility to society, seeking to generate positive inputs. Hence our operations, the projects we take part in and the initiatives we undertake are aligned with our CSR values.

- We run and take part in numerous general and cooperative events and conferences on the economy, the agri-food industry, health, sport, innovation and sustainability.
- We have a corporate website, a specific website for CSR and three product websites for wine, seedless watermelons and Persimon kakis.
- Our social media are segmented by target audience. We have corporate and consumer accounts.

### 3.11 Teamwork

Communication is the bedrock of teamwork, sharing ideas, opinions and updates openly and honestly, as well as actively listening to others and being willing to learn and adapt. The Anecoop Group believes that teamwork is essential to efficiently and effectively achieve our goals.

The Group fosters collaboration through regular meetings and joint projects. When selecting participants for these projects, it seeks to ensure that all departments and levels of responsibility are involved.

- The IT Department has developed tools to foster teamwork, optimize HR management, enhance sales and production planning and monitoring, implement market intelligence platforms, draw up the Security Master Plan, and set up the **Group's IT Committee**. These efforts aim to promote unity, improve communication, and identify synergies.

### 3.12 Innovation and Knowledge Transfer

One of Anecoop's strategic priorities is to set the standard for innovation in the fruit and vegetable industry. The Group is committed to transferring knowledge to its members to solve problems and foster collaboration.

#### *What we do...*

We have several levels and bodies in place to lead, coordinate and unlock innovation in Anecoop and among our members.

- The **Strategy and Innovation Committee**, a recently created control body, reviews whether the innovations underway are in line with the Group's core strategies and puts forward recommendations and improvements.
- Our **Production and Innovation Department** has two field stations and a biotechnology laboratory for conducting R&D and innovation projects to develop new varieties and upgrade current growing methods and techniques.
- Our **Quality and Sustainability Department** has a post-harvest laboratory to extend the commercial life of products and evaluate new varieties.
- Our **Innovation Board** is made up of a group of staff from different areas of the company whose purpose is to organise and drive innovation across the organisation. They suggest and supervise cross-cutting projects undertaken by specialists and staff from various departments and areas and report on and promote innovation throughout the company.



## Shared Responsibility & Commitment

### 3.13 Environment

The Group undertakes to reduce its impact on the environment by making its operations and those in its value chain more sustainable. Ensuring the sustainability of agriculture is one of the core aspects of our organisation. Safeguarding the environment in every area of our work is part of our management.

The Group demonstrates its steadfast commitment to sustainable agriculture by actively engaging in sustainable projects, commitments, and agreements, while also adhering to the precautionary principle outlined in the 1992 Rio Declaration on Environment and Development.

#### What we do...

- We measure our carbon footprint and deploy measures to diminish it.
- We are committed to cutting energy consumption and generating and using renewable energy.
- The Group is committed to reducing, controlling and efficiently managing waste from our own operations and those of our suppliers.
- Anecoop's Sustainability Observatory is devising a customised methodology to measure our fruit and vegetable suppliers' impact on sustainability, assess them and take action accordingly in line with our stated aims.
- We roll out environmentally friendly production systems in our cooperatives and member companies such as *naturane*, which is based on the principles of Integrated Pest Management (IPM) systems, promoting biological control and the reduction and rational use of plant protection products during the growing and post-harvest stages.
- The Group backs initiatives to encourage biodiversity in agricultural production.
- We promote organic production and integrated pest control.
- We strive to streamline and reduce water use.
- We take part in waste recovery projects.
- We are committed to minimising food waste throughout our operations.
- We support and provide specific training for our staff and suppliers.

### 3.14 Due Diligence in our Supply Chain

The Anecoop Group is committed to fostering processes and measures to identify, prevent, mitigate and eliminate actual or potential negative impacts on the environment and human rights throughout its supply chain, including the supply, manufacture and distribution of products. This also encompasses the management of distribution channel flows between suppliers, customers and end consumers.

#### How we work with our suppliers...

Suppliers must comply with applicable labour legislation. Compliance with this legislation ensures conformity with international conventions (ILO, UN, etc.) and ethical business conduct while securing occupational health and safety, freedom of association and collective bargaining, non-discrimination, special protection for young people, fair remuneration, decent working hours and the absence of child, precarious and forced labour.

The Anecoop Group encourages its suppliers to procure environmental, occupational health and safety, social responsibility and other certifications wherever possible.

In particular, suppliers wishing to work with the Anecoop Group are required to comply with **minimum standards of conduct**.

1. **Respect for human dignity.** Everyone deserves to be treated equally and fairly, and their rights must be safeguarded and upheld at all times. This includes the right to life, liberty, security, privacy and participation in social and political life.
2. **Compliance.** Domestic laws and regulations and international ILO and UN conventions are to be complied with. The company must comply with the obligations resulting from its operations as well as any in-house rules and good business practices it has voluntarily adopted.
3. **Ban on child labour.** This is a fundamental principle which seeks to protect children and ensure their full development. The minimum age for employment may not be lower than the legal school leaving age. Under no circumstances may employees be younger than 15 years of age (or 14 years of age if allowed under national law pursuant to ILO Convention 138). The term “child labour” refers to a form of exploitation which violates human rights and is recognised and defined by international bodies. ILO Convention 182, complementary to Convention 138, requires governments to give priority to eliminating the worst forms of child labour performed by all children under the age of 18.
4. **Ban on forced labour and disciplinary measures.** Forced labour of any kind is banned. “Forced labour” means labour performed under coercion or threat rather than voluntarily. Safeguarding the rights of workers and combating all forms of labour exploitation is essential under the ILO Forced Labour Convention, 1930 (No. 29). Physical punishment, psychological or physical violence and verbal abuse are also prohibited.
5. **Working conditions and remuneration.** All laws, regulations and professional standards regarding pay and working conditions are to be complied with. All employees are to be informed of their rights and the terms and conditions of their employment (such as remuneration, working hours and holiday entitlement) in a way that is easy to understand and, where national law so provides, must also have a written contract of employment. All employees are to be remunerated according to the statutory minimum wage or, if higher, on the basis of collective agreements. Employees must be entitled to adequate remuneration to enable them and their families to lead a decent life. Employees will not work more than the hours permitted by law. Legally established rest days must also be upheld.
6. **Ban on discrimination.** Suppliers must ensure dignified and respectful treatment of their employees, including a ban on harassment and discrimination. They are required

to prohibit any form of discrimination in accordance with the ILO core conventions on grounds of race, ethnicity, national origin, culture, language, skin colour; marital status, pregnancy status, social, economic or legal status; age, sex, sexual orientation, gender identity and expression; disability or health-related issues, protected genetic information, and religion, political affiliation or trade union membership.

A whistleblower channel is also to be made available to employees and suppliers are encouraged to implement safeguards to prevent harm resulting from violence or discrimination.

7. **Freedom of association and assembly.** Everyone has the right to freedom of peaceful assembly and the right of association which are fundamental pillars of democracy. Employees have the right to collective bargaining.
8. **Freedom of expression** (Article 19 Universal Declaration of Human Rights). Suppliers undertake to ensure the right to free speech and expression without fear of retaliation.
9. **Occupational health and safety.** Suppliers shall ensure a safe working environment where employees can perform their work safely, healthily and hygienically. Workplaces and facilities must comply with pertinent laws and regulations. Whenever required by applicable regulations, an occupational health and safety officer shall be appointed.
10. **Right to privacy** (Article 12 Universal Declaration of Human Rights). Suppliers are required to ensure that personal information about their employees is not improperly or unlawfully acquired and not used, transferred, lost or disseminated, or misused or used in an unauthorised way.
11. **Protecting local communities.** Suppliers are expected to foster lasting partnerships in the communities in which they operate by actively addressing the social and environmental challenges these communities face. They shall support, to the extent possible, local productive communities with appropriate economic conditions which promote their inclusive development and help to enhance living and working conditions.
12. **Environmental protection.** Suppliers must comply with applicable environmental legislation and adopt effective policies and procedures which reflect their environmental responsibility. Suppliers shall also implement appropriate measures to avoid or minimise adverse effects on the community, natural resources and the environment in general. Suppliers' operations must comply with waste, emission and water protection legislation. They shall adhere to all regulations concerning harmful substances and their disposal, and employees must be instructed on how to handle hazardous materials and substances.
13. **Ethical conduct.** Suppliers must ensure no conflicts of interest in their operations. They must not to engage in any form of corruption, extortion or bribery; not to directly or indirectly offer gifts or benefits to public officials or private entities; and to safeguard the confidentiality of any personal data and confidential information that comes into their possession as set out in applicable regulations.

14. **Fair competition.** Suppliers are required to operate in accordance with the principles of fair competition and refrain from any kind of anti-competitive practice and any behaviour which may constitute abuse of a dominant position. They undertake to compete fairly and ethically within the framework of antitrust law in compliance with national and international competition rules.
  
15. **Responsible sourcing.** Suppliers are required to ensure that products or services supplied to the Anecoop Group do not directly or indirectly finance or promote human rights violations or have serious and recognised negative social and/or environmental impacts. Suppliers are required to inform the Group of any due diligence measures taken on request.
  
16. **Compliance.** Suppliers shall ensure that their subcontractors comply with applicable legal standards and the commitments set out in this Code. If they become aware of any signs of significant breach of this Code of Ethics, they must report it immediately. Suppliers are required to provide written information about the breach, the individuals involved and any consequences resulting from it on request. Suppliers must cooperate in the clarification measures relating to the breach. The notification must be made with due regard for the legitimate interests of the supplier and with respect for the rights of employees, especially data protection and trade secrets. This also applies to breaches by subcontractors.  
A whistleblower channel shall be available for anonymous and confidential reporting of breaches while additionally ensuring that there will be no retaliation.
  
17. **Audits.** Suppliers must facilitate verification of compliance with this Code. They shall respond to written requests for information and enable visits to their facilities for this purpose. Suppliers may be given a reasonable period to remedy a breach of any of the obligations set out in this Code. If this is not possible, they may be given a warning. If they have not remedied the breach or if it is repeated, the contractual relationship may be terminated, notwithstanding the right to any compensation for damages.

In this respect, the **Food Contract for Suppliers** includes as an appendix “Basic rules for the supply of fruit and vegetables to Anecoop S. Coop.” which stipulates compliance with the regulations applicable to the business together with environmental and labour legislation and the protection of human rights.

### *How we work with our customers...*

The Group undertakes to meet customer needs by providing a continuous supply of quality produce, striving for service excellence and delivering the promised quantity of produce on time.

The Group undertakes to ensure that the produce supplied has been ethically and responsibly produced by its suppliers with no child labour or breach of labour regulations.

In its quest to cultivate customer loyalty, the Group undertakes to provide clear, transparent communication, including setting up physical and electronic communication channels.

Anecoop guarantees the confidentiality of any information provided by customers and the protection of personal data.

### *How we engage with society...*

The Group undertakes to supply healthy, safe and high-quality produce which is ethically and responsibly sourced.

The Group undertakes not to engage in unfair competition in its marketing and advertising campaigns and to provide consumers with accurate food information.

The Group undertakes to actively participate in sporting events and initiatives that promote the consumption of fruit and vegetables.

### **3.15 Food Quality and Safety**

Providing healthy and safe produce to consumers is part of Anecoop's Mission. To achieve this goal, Anecoop's Quality and Sustainability Department works alongside the specialist teams in its member organisations to implement food quality and safety systems and enhance processes from the field to the supermarket shelf while complying with food legislation and safeguarding the environment.

### *What we do...*

- We implement systems to control the food quality and safety of the produce we market.
- We conduct inspections and audits of suppliers, traceability procedures and application of the waste control plan based on HACCP and national and international legal requirements for production and marketing.
- We draw up and roll out improvement plans.

### 3.16 Management Efficacy and Efficiency

Boosting efficacy and efficiency in all business and operational management processes is one of the Anecoop Group's strategic priorities.

#### *What we do...*

- We are committed to the digital transformation of our processes and to increasing the use of technology in our business, thus reducing the need for printing and saving paper.
- We are committed to budget planning and management processes that help management decision-making processes by providing relevant information on business performance and target achievements.
- We are committed to efficiently using the resources made available to employees and management to conduct our business.
  - **The material resources** Anecoop makes available to employees and managers (including, but not limited to, mobiles, laptops, tablets, furniture, photocopiers, printers, internet, stationery, email, etc.) must be used efficiently and may not be used for their own benefit.
  - **Communal areas**. These areas shall be used responsibly and left in good condition for others to use.
  - **Office supplies**. They shall be used responsibly and appropriately.
  - **Anecoop's IT and communications equipment and systems**. The use policies issued by the Information Technology (IT) Department must be followed.

### 3.17 Labour Practices and Human Rights

We are signatories to the United Nations Global Compact and therefore committed to ensuring that its ten principles are upheld. This means that within its sphere of influence, the Group acts resolutely to safeguard the human rights set out in the United Nations International Bill of Human Rights and ensures that no Anecoop Group company is liable, by action or omission, for any kind of violation of these rights.

Employment rights and obligations are set out in the collective bargaining agreements that apply to each of the Group's companies and, where not covered, in labour legislation as well as in the Conventions of the International Labour Organisation (ILO) and in the Declaration on Fundamental Principles and Rights at Work.

The Group makes the following commitments, and all members of the Group are responsible for ensuring their compliance.

- a) Preventing discriminatory practices and any which undermine people's dignity.
- b) Rejecting child labour and forced or compulsory labour.
- c) Respecting the freedom of association and collective bargaining of its employees together with the roles and responsibilities of workers' representatives in accordance with the laws in force in each country.
- d) Providing decent employment.
- e) Implementing control procedures to identify with due diligence any potential risks of human rights violations and putting in place mechanisms to prevent and mitigate these risks.

### 3.18 Health and Safety

Ensuring a safe and healthy working environment is a priority for the Anecoop Group. The International Labour Organisation (ILO) has officially recognised occupational health and safety as a fundamental right.

Health and safety are crucial to the wellbeing of employees and their families and also essential factors which are instrumental in enhancing the company's productivity, competitiveness and sustainability.

Prevention is a key concept in occupational health and safety. Indeed, preventing accidents at work and occupational diseases should be the main purpose of any occupational health and safety management system as opposed to addressing issues after incidents have taken place.

#### *What we do...*

- Anecoop supplements the gross amount of employees' salaries up to 100% to ensure they do not experience any hardship when they are off work due to illness or accident.

- An outsourced company provides medical check-ups every year for all employees who voluntarily choose to have them. The same company also conducts an annual review of all workstations and facilities to prevent occupational hazards.
- Everyone hired at Anecoop is covered by an accident insurance policy.
- After one year's employment at Anecoop, employees have the option of taking out individual private medical insurance on a voluntary basis with a 25% discount on the annual premium, which is paid by Anecoop.
- The Employee Portal provides information on **risk prevention** for each job.
- If there is an accident at work, we can call on the healthcare centres of an outsourced company and there are first-aid kits in all Anecoop workplaces.

### 3.19 Quality Employment

Personal engagement, commitment, cooperation and coordination at work are essential concepts which are part of our Group's corporate culture.

#### *What we do...*

- We encourage internal promotion: when a vacancy needs to be filled and before inviting applications and starting an external selection process, the People and Talent Department informs the entire workforce of the post to be filled and the profile and the requirements to be met. This enables interested employees to apply as candidates following the procedure set out in the **Staff Selection Policy** posted on the Intranet.
- We carry out our own external recruitment, reducing the use of temporary employment agencies. Whenever possible, external recruitment is carried out by the People and Talent Department in partnership with relevant managers and executives. In cases where this is not feasible or in special situations, outsourced consultants or agents are engaged. Temporary employment agencies will continue to be used for temporary replacements or contingencies.
- We support recruitment by our employees themselves: all employees are told internally about the start of an external selection process so they can help with recruitment by providing and facilitating applications from professionals in the market who they know and who match the requirements and background of the vacant post, thereby expediting the selection process pursuant to our Staff Selection Policy.
- We endorse permanent contracts: **permanent** contracts are used for new recruits, with a trial period lasting three months for non-graduates and six months for graduates, as specified in current employment legislation.
- We promote compliance with regulations and share information: in addition to our "Welcome Manual" explaining "What is Anecoop?", new recruits are also given (or told where they can view them) on signing the acknowledgement of receipt form our **Data Protection Policy**, **Information Security Policy** and **Policies on using Anecoop's IT and communications equipment and systems**.



- We have a results-based remuneration policy: Anecoop's **Remuneration Policy** (applicable from 1 October 2022), available to all employees on the Intranet, sets out the principles and guidelines for how the company compensates its staff based on each employee's input to achieving its results. The Remuneration Policy includes management of both fixed and variable remuneration (also known as incentives) which each employee receives at the end of each season or financial year based on the results attained.
- We are committed to equal treatment and opportunities for men and women: the organisation has its **1<sup>st</sup> Equal Opportunities for Men and Women Plan (2020-2023)** pursuant to Chapter III of Spanish Law 3/2007 and is resolutely engaged in promoting real equality within the organisation by ensuring equal opportunities for men and women as a strategic principle in its Corporate and Human Resources Policy. Our **2<sup>nd</sup> Equality Plan is currently under negotiation.**
- We are committed to shared responsibility in personal, family and work-life rights: the organisation undertakes to appoint a person as a Work-Life Balance Officer to identify and address its staff's specific work-life balance needs.
- We are committed to increasing the number of women in management positions.
- We are committed to preventing sexual and gender-based harassment. The Group has a **Protocol for preventing and taking action against sexual and gender-based harassment.**
- We are committed to fostering a **good working environment.**
  - We do not tolerate disrespect towards co-workers or superiors. We seek to support a good working environment by promoting conflict resolution.
  - We do not tolerate any form of workplace discrimination or bullying.
  - We do not tolerate sexual harassment in the workplace.

Any employee who is experiencing abuse or becomes aware that their rights are being violated or that unethical conduct is taking place in their work environment should immediately bring it to the attention of the People and Talent Department for investigation and appropriate action, which may involve the disciplinary measures envisaged in the Workers' Charter. Likewise, it must be reported to the Ethics Committee.

- We are committed to performance appraisal: a Performance Appraisal system supported by an IT tool has been implemented, streamlining the response time of appraisals and their filing system.
- We are committed to the Works Committee. The Committee has a section on the Intranet to post information on its activities together with any suggestions made by employees and the status of these proposals (under study, accepted, rejected).

### 3.20 Human Capital Development

Our Mission statement specifies that the organisation ensures the personal and professional development of its employees, hence the importance of our **Training Plan** for the Group.

The Training Plan matches the needs of the company with the training needs of staff in the work teams and includes management and senior management courses, skills and competence development courses, language courses and technical training courses.

We invest in providing our members with continuous training in a range of specialised areas tailored to their profiles (growers, harvesters, packing house staff, quality specialists, sales staff, production heads, chairs and managers). This enables us to deliver better service to our customers.

The Quality and Sustainability Department runs training activities to enhance the selection and harvesting process, updating customer specifications, organising processes and increasing productivity, and implementing improvement plans in packing houses.

The Production and Innovation Department arranges visits to our field stations, technical and informative conferences, meetings and seminars. Training is designed to make farms more profitable by exploring new areas of opportunity for our producers. This calls for training in new varieties, growing techniques and introducing new technologies applied to agriculture.

The Green Deal is a European Union instrument which consists of turning climate and environmental challenges into opportunities. Consequently, a large part of the training courses for our members are tied to the “From Farm to Fork” strategy whose purpose is to achieve healthier and more environmentally friendly production. We have thus conducted experiments in harnessing useful fauna, plant covers and irrigation which have provided a model for our growers to improve their crops by rolling out new production systems.

## 4. OUR COMMITMENT

### 4.1 Corporate Social Responsibility Report

The Group is committed to the annual publication of its Corporate Social Responsibility Report in which it discloses how it does things economically, environmentally, with people and in human rights.

### 4.2 Ethics Committee

An Ethics Committee has been set up and has the following members:

- People and Talent Director
- Legal Department Director
- Sustainability Manager
- Communications Manager
- Chair of the Works Committee
- Workers' representative on the Governing Board
- Governing Board Secretary
- External adviser

The Ethics Committee may act on its own initiative and also at the request of any employee or manager, supplier or third party with a direct relationship and legitimate commercial or professional interest in Anecoop, by means of a report made in good faith.

Any queries about the interpretation or application of this Code may be made by:

- Writing to the Group's head office: C/ Monforte, nº 1, entlo., 46010 Valencia (Spain)
- Sending an e-mail to: [comitedeetica@anecoop.com](mailto:comitedeetica@anecoop.com)

The Ethics Committee reports directly to the Managing Director and has the following core duties:

- a) Supervising compliance with and internal awareness of the Code.
- b) Checking and overseeing how cases are handled and resolved.
- c) Interpreting and clearing up any issues posed by the application of this Code.
- d) Proposing any clarifications and implementing regulations required for the application of this Code to the Governing Board, following a report from the Legal Department, and at least one annual report reviewing its application.
- e) Supervising the Whistleblower Channel and compliance with its procedures.
- f) Regular updating of the Code of Ethics.

### **The Ethics Committee ensures:**

1. The confidentiality of data and actions carried out unless disclosure is required by law or court order.
2. Thorough analysis of any data, information or document used as the basis for its action.
3. The investigation of proceedings in which it will always act independently and with full respect for the right to a hearing and the presumption of innocence of any person concerned.
4. Complainants are not subject to any detrimental action as a consequence of submitting petitions or reports in good faith to the Committee.

The Ethics Committee has the means required to ensure the enforcement of this Code.

The Ethics Committee's decisions are binding on the company and on employees and managers.

Any **breach of the Code of Ethics** observed in the workplace shall be reported to the People and Talent Department or the Ethics Committee so that appropriate corrective measures can be taken.

No breaches of the Code will be tolerated. Actions or omissions which constitute serious or very serious breaches of the Code may be considered as misconduct and penalised as such in accordance with their classification and severity as regulated in applicable collective bargaining agreements or by law.

### **Review by the Ethics Committee**

Its purpose is to evaluate and review the Code of Ethics, its implementation and compliance. These reviews are to contain at least audit results, customer feedback, process compliance and conformity with the Ethics Committee's core duties, status of preventive and corrective actions, follow-up measures for previous reviews, changes which may impact management systems and recommendations for improvement.

The Ethics Committee may call meetings whenever it sees fit to discuss a matter of interest related either to the Management System or to any significant issue requiring a meeting of the Committee. It shall meet at least once a year.

All actions agreed by the Ethics Committee at its meetings will be brought to the attention of all appropriate staff.

### **4.3 Ethics Hotline**

An e-mail address [comitedeetica@anecoop.com](mailto:comitedeetica@anecoop.com) is available to bring any complaints or breaches of this Code to the attention of the Ethics Committee and to submit suggestions and improvements.