

## SOVENA GROUP – SUPPLIER CODE OF CONDUCT

### I. Introduction and context

Sovena Group's Purpose is to accelerate the evolution of global food, promoting quality, food safety, and sustainability throughout its value chain. As an essential part of this commitment, this Supplier Code of Conduct (hereinafter referred to as the "Code") defines the minimum standards of ethical, social, environmental, and quality conduct expected from its business partners.

Sovena Group considers sustainability, food safety, and quality as shared responsibilities between the company and its suppliers. It is essential to ensure adherence to common standards of conduct and performance, basing commercial relationships on integrity, responsibility, and mutual respect to build a resilient supply chain aligned with global challenges.

This Code aligns with the Sovena Group's commitments and values, as well as with the company's [Sustainable Procurement Policy](#), [Code of Ethics and Conduct](#), and other relevant internal Group [Policies](#) referenced in this Code.

This Code includes two complementary annexes: [Annex I – Supplement for Agricultural Product Suppliers](#), which defines additional criteria applicable to suppliers in this specific sector, and [Annex II – Glossary](#), which aims to clarify the main terms, standards, and concepts used throughout the document, promoting a clear and consistent interpretation of its contents.

### II. Scope of application

This Code applies to all direct and indirect suppliers (tier 1 and tier n) of Sovena Group and its companies, including subcontractors, service providers, cooperatives, and any third parties involved in the provision of goods and services to Sovena Group (raw materials, auxiliary materials, and services). Regardless of geographic location or local legal framework, all suppliers are expected to comply with the requirements defined in this document.

Sovena Group also expects its suppliers to appropriately communicate this Code to their employees, suppliers/sub-suppliers, and relevant partners, promoting the progressive adoption and application of the principles defined herein throughout the supply chain. Compliance with this Code constitutes an essential criterion in commercial relationships with Sovena Group.

### III. Frameworks, standards, and applicable legislation

Sovena Group expects all its suppliers to act in strict compliance with the applicable legislation in the countries where they operate, as well as with recognized international standards and frameworks. This approach aims to ensure ethical, transparent behaviour aligned with the highest standards of corporate responsibility.

Suppliers must:

- Comply with applicable national and local legislation on labour, tax, environmental, health, safety, and anti-corruption matters;
- Respect the principles established in the United Nations [Universal Declaration of Human Rights](#);
- Align with the Fundamental Conventions of the International Labour Organization ([ILO](#));
- Observe the Principles of the United Nations Global Compact ([UNGC](#)) and the [OECD Guidelines](#) for Multinational Enterprises on Responsible Business Conduct;
- Be aware of the fundamental principles of key reference standards, namely: [ISO 26000/SA 8000](#) (Social Responsibility), [ISO 20400](#) (Sustainable Procurement), [ISO 45001](#) (Occupational Health and Safety), and [ISO 14001](#) (Environmental Management);

- Stay up to date with relevant legislative and regulatory changes applicable to their activity and value chain.

Non-compliance with the essence of these frameworks may compromise the commercial relationship with Sovena Group.

#### **IV. What we expect from our suppliers**

##### **(i) Ethics and integrity**

Sovena Group expects all suppliers to act with the highest level of integrity, honesty, and professionalism. Ethical conduct is essential to maintain trust in commercial relationships and ensure the supply chain operates transparently and responsibly.

In alignment with the [Anti-Corruption Policy](#) and [Conflict of Interest Policy](#), suppliers must:

- Condemn and refrain from any form of corruption, bribery, extortion, illicit payments, fraud, and money laundering;
- Implement prevention and control measures against unethical practices, including internal compliance programs;
- Declare to Sovena Group any actual or potential conflict of interest that may affect impartiality in the commercial relationship;
- Ensure all commercial transactions are recorded accurately and transparently, following applicable accounting and tax principles;
- Refrain from anti-competitive practices, including price-fixing or market division agreements;
- Cooperate with legitimate investigations conducted by competent authorities or Sovena Group, whenever related to the topics covered herein.

Sovena Group reserves the right to terminate commercial relationships with suppliers involved in illegal or unethical practices, even if such practices do not individually constitute a legal violation in their country of origin.

##### **(ii) Human rights and labour conditions**

Respect for human rights and fundamental labour standards is a non-negotiable principle for Sovena Group. All suppliers are expected to adopt practices that ensure fair, dignified, and safe treatment of all employees in any geography where they operate.

In alignment with the [Human Rights Policy](#), suppliers must:

- Prohibit and prevent child labour, forced labour, human trafficking, or any form of modern slavery;
- Ensure employment contracts are established in writing, voluntarily, and in compliance with applicable legislation;
- Promote a work environment free from harassment, abuse, physical or psychological punishment, and discrimination based on gender, race, religion, sexual orientation, age, disability, or any other legally protected factor;
- Guarantee freedom of association and the right to collective bargaining, respecting the role of employees' representative organizations;
- Comply with all legal provisions related to working hours, rest days, fair remuneration, and mandatory social benefits;
- Ensure that all employees, including migrants and temporary employees, have equal rights and access to decent working conditions.

Sovena Group values partners that promote inclusion, diversity, and human development as integral parts of an ethical and sustainable value chain.

##### **(iii) Health, safety, and well-being at work**

Sovena Group recognizes the importance of safe and healthy work environments as essential conditions for the sustainable performance of its suppliers' activities. Ensuring employee health and safety, preventing accidents, and promoting physical and mental well-being are priorities that must be reflected in the daily operational practices of Sovena Group's partners.

Suppliers must:

- Fully comply with applicable national legislation on occupational health and safety;

- Identify, assess, and mitigate occupational risks, implementing adequate preventive and corrective measures;
- Provide access to safe sanitary facilities, potable water, personal protective equipment (PPE), and appropriate rest areas;
- Ensure all employees receive adequate and periodic training on health and safety at work;
- Promote a prevention culture, encouraging active employee participation in identifying and resolving risks;
- Investigate work incidents and accidents to mitigate them and continuously improve working conditions.

Sovena Group values suppliers that go beyond legal compliance and promote the integral well-being of their employees as part of their responsible management strategy.

#### **(iv) Quality, food safety, and food defense**

As a company in the agro-industrial sector, Sovena Group places quality, food safety, and food defense at the core of its mission. Suppliers play a vital role in protecting consumer health and ensuring compliance with the standards required by the company and the relevant authorities.

To ensure the integrity of the products and services provided, and aligned with its [Quality and Food Safety Policy](#), suppliers must:

- Comply with all applicable legal and regulatory requirements on quality, food safety, and food defense in the markets where they operate;
- Ensure that the products supplied meet the technical specifications and quality standards agreed with Sovena Group;
- Implement, where applicable, effective quality, food safety, and food defense management systems, based on recognized standards (e.g., ISO 22000, FSSC 22000, HACCP, BRCGS, IFS, ISO 9001);
- Implement effective preventive measures to avoid the intentional tampering of products with physical, chemical, biological, or radiological substances, in line with recognized food defense principles;
- Ensure traceability of products throughout the supply chain and provide such information whenever requested;
- Immediately report to Sovena Group any incident that could compromise the safety or quality of the products supplied;
- Fully cooperate with control actions, audits, product recalls, and investigations related to quality and food safety.

Sovena Group values suppliers that share its commitment to excellence and responsibility in delivering safe, consistent, and high-quality products.

#### **(v) Environmental sustainability**

Sovena Group is committed to environmental protection and the transition to a low-carbon, circular, and resource-efficient economy. As part of this vision, suppliers are expected to conduct their activities responsibly, minimizing negative environmental impacts and promoting practices that support ecosystem regeneration.

In line with the Sovena Group's [Environmental Policy](#), suppliers must:

- Fully comply with applicable environmental legislation and regulations in the jurisdictions where they operate;
- Identify, monitor, and control the main direct and indirect environmental impacts of their operations, including emissions (greenhouse gases and other atmospheric emissions), effluents, waste, and use of natural resources;
- Promote energy efficiency and sustainable use of water and raw materials;
- Implement circular economy practices, including waste prevention, reuse, and recycling of materials whenever possible;
- Develop and apply documented environmental management plans appropriate to the scale and nature of their operations;
- Minimize the use of hazardous substances and ensure their proper handling and disposal;
- Promote biodiversity conservation and avoid activities in areas of high conservation value, unless legally authorized and under appropriate mitigation plans;
- Support R&D initiatives aimed at developing technologies, processes, services, products, or materials that benefit the environment, fostering sectoral collaboration;
- Report to Sovena Group, whenever requested and within reason, the main environmental indicators associated with the products or services supplied.

Sovena Group values suppliers that demonstrate environmental leadership, adopt decarbonization targets, and actively collaborate to reduce environmental impact throughout the supply chain.

#### **(vi) Responsible supply chain management**

Sovena Group acknowledges that a sustainable and ethical supply chain depends on the shared responsibility of all its stakeholders. Therefore, Sovena Group requires its suppliers to uphold the same rigor and commitment to the principles defined herein in their relationship with their suppliers, subcontractors, and business partners.

Aligned with the Sovena Group's [Sustainable Procurement Policy](#), suppliers must:

- Implement due diligence practices to identify, assess, and mitigate ESG risks in their value chain, to the extent reasonably possible;
- Promote the principles of this Code among their suppliers, ensuring alignment with Sovena Group's values;
- Monitor the performance of their suppliers on environmental, social, and governance matters, adopting corrective measures whenever necessary;
- Maintain updated records that demonstrate compliance with the required standards;
- Collaborate with Sovena Group in strengthening transparency and traceability across the supply chain.

#### **(vii) Confidentiality and data protection**

The treatment of information with integrity and responsibility is essential for maintaining a relationship of trust between Sovena Group and its suppliers. Therefore, compliance with applicable confidentiality and personal data protection rules is required.

Suppliers must:

- Protect all confidential information to which they have access within the scope of their commercial relationship with Sovena Group;
- Use this information exclusively for authorised purposes, refraining from disclosing it to third parties without prior written consent;
- Comply fully with data protection legislation, including the General Data Protection Regulation (GDPR), where applicable;
- Immediately report any incidents of data breaches or unauthorised access to the Sovena Group.

### **V. Mechanisms for communication, reporting, and information treatment**

Sovena Group provides appropriate channels for suppliers, employees, and other stakeholders to communicate concerns, report inappropriate conduct, or request clarification regarding this Code. You can contact the Sovena Group at [corporate.quality@sovenagroup.com](mailto:corporate.quality@sovenagroup.com).

- All communications will be treated as confidential, ensuring the protection of personal data and no retaliation against those who report incidents;
- The Sovena Group undertakes to properly investigate all complaints and take corrective action whenever necessary;
- Suppliers must cooperate with any legitimate investigation conducted under this Code.

### **VI. Monitoring, evaluation and compliance**

To ensure compliance with this Code, Sovena Group may conduct periodic assessments, audits, and other procedures with its suppliers. These actions aim to promote continuous improvement and prevent risks in the supply chain..

- Suppliers must provide Sovena Group, whenever requested, with information and documentation proving compliance with the requirements of this Code;
- Sovena Group may conduct audits, visits to facilities, or interviews with employees, with or without prior notice;
- Sovena Group may also use internal systems or external risk assessment platforms to identify and monitor potential impacts throughout the supply chain.
- In the event of non-compliance, suppliers must implement corrective action plans within a reasonable timeframe, defined jointly with Sovena Group;

- Repeated or serious non-compliance with the commitments defined herein may result in the suspension or termination of the business relationship.

## **VII. Consequences of non-compliance**

Failure to comply with the provisions of this Code may compromise the commercial relationship with the Sovena Group. Particularly relevant will be breaches that jeopardise product integrity, human rights, and the environment.

The Sovena Group reserves the right to demand immediate correction, or within a reasonable time, of irregular or non-compliant practices.

## **VIII. Review, update, and communication**

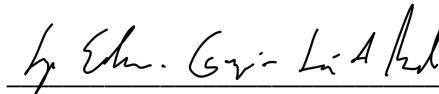
This Code of Conduct will be reviewed and updated periodically, whenever relevant legal, strategic, or operational changes occur. The updated version will be made available on the Sovena Group's corporate website and communicated appropriately to the suppliers.

Sovena Group is committed to promoting awareness and training initiatives among its suppliers, with the aim of supporting the understanding and implementation of the principles of this Code. Likewise, Sovena Group expects suppliers to adopt internal measures to ensure that their employees, suppliers, and other relevant business partners are aware of and apply this Code.

## **IX. Entry into force**

This Code shall enter into force on the date of its publication. Acceptance of this Code is a prerequisite for establishing and maintaining any business relationship with the Sovena Group. Suppliers who already have an established business relationship with the Sovena Group must comply with these provisions within a reasonable time agreed with Sovena Group.

On behalf of the Board of Directors,

A handwritten signature in black ink, appearing to read "Edmundo Garcia", is written over a horizontal line.

Maio de 2025

## ANNEX I – SUPPLEMENT FOR SUPPLIERS OF AGRICULTURAL PRODUCTS

This supplement is part of the Sovena Group's Code of Conduct for Suppliers, with the aim of identifying additional minimum criteria that must be met by suppliers of agricultural products. These criteria are essential for promoting responsible agricultural practices that contribute to the sustainability of ecosystems, food safety, respect for human rights, and the quality of the products supplied.

This supplement is complementary to and does not replace the principles established in the Sovena Group Supplier Code of Conduct. It will be reviewed periodically to ensure that it remains up to date with developments in sustainable agricultural practices and applicable regulatory requirements.

### Scope of application

This supplement applies to all suppliers who produce or supply agricultural products to Sovena Group, including farmers, producers and producer associations, cooperatives, and intermediaries.

### Criteria for the sustainable supply of agricultural products

Agricultural suppliers must:

- Ensure the traceability of agricultural products, allowing the origin and those responsible for each stage of the value chain to be identified.
- Promote recognised certifications wherever applicable.
- Strengthen responsibility in the supply chain by promoting the principles of this supplement among its suppliers and business partners.

### Criteria for the sustainable production of agricultural products

(i) Agrochemicals and Fertilisers: use plant protection products and fertilisers in accordance with recognised standards and good agricultural practices, minimising environmental contamination and protecting human health.

(ii) Soil: adopt agricultural practices that maintain or improve soil structure, fertility and biodiversity, preventing erosion and contamination.

(iii) Water Resources: ensure efficient and sustainable water use, protecting water quality and respecting third-party rights, particularly in areas of water stress.

(iv) Biodiversity and Ecosystems: avoid practices that promote biodiversity loss and implement measures to prevent, mitigate, or compensate for negative impacts, especially in sensitive areas.

(v) Agricultural Expansion and Deforestation: avoid expansion into protected natural areas or areas of high conservation value. Follow legal guidelines and sectoral commitments on land use and deforestation.

(vi) Greenhouse Gas (GHG) Emissions: adopt practices that reduce GHG emissions in agricultural production, such as efficient use of resources, renewable energy, and regenerative agriculture techniques.

(vii) Land Rights: respect land use and property rights, ensuring the free, prior, and informed consent of local communities, including indigenous peoples, where applicable.

## ANNEX II – GLOSSARY

### ESG and compliance terms

- **ESG (Environmental, Social and Governance):** a set of criteria that assess the performance of a company in environmental, social, and governance aspects, reflecting its commitment to sustainability and corporate responsibility.
- **Value chain:** set of activities, processes, entities, and flows involved in the creation, production, and delivery of a good or service to the end customer, including suppliers, producers, distributors, and other stakeholders.
- **Tier 1/tier n suppliers:** tier 1 refers to direct suppliers who supply products or services directly to the Sovena Group. Tier n refers to indirect suppliers - other suppliers along the value chain who do not have a direct contractual relationship with the Sovena Group.
- **Due diligence:** systematic process of identifying, assessing, and mitigating actual or potential risks in the areas of human rights, environment, ethics, and compliance throughout the supply chain.
- **Conflict of interest:** a situation in which an individual's personal, financial, or professional interests may compromise their impartiality in decisions related to the company, potentially negatively affecting the ethics and objectivity of their actions.
- **Traceability:** the ability to track and document all stages of a product's production process, from the origin of the raw material to the end consumer, ensuring transparency and safety in the supply chain.
- **Corrective action plan:** a set of measures established to correct identified non-conformities and prevent their recurrence, usually with defined deadlines and responsibilities.
- **Food defense:** set of preventive measures designed to protect food against intentional tampering with hazardous substances, ensuring the integrity and safety of food products.
- **Child labour:** employment of children in activities that harm their health, education, or development, which is prohibited by international standards and national legislation.
- **Forced labour:** any work or service required of a person under threat of punishment and for which they have not volunteered.
- **Freedom of association:** the right of workers to organise themselves into trade unions or other associations to defend their collective interests.
- **Collective bargaining:** a process of dialogue between employers and workers' representatives aimed at reaching agreements on working conditions and other issues of mutual interest.
- **Inclusion and diversity:** practices that promote the equitable participation of people from different backgrounds, cultures, genders, and abilities in the workplace.
- **Circular economy:** an economic model that seeks to reuse, recycle, and regenerate materials and products, reducing waste and environmental impact.
- **Decarbonisation:** process of reducing greenhouse gas (GHG) emissions, to mitigate climate change and promote environmental sustainability.
- **Recognised certifications:** certifications issued by accredited bodies that attest to the compliance of products, services or systems with specific standards.

### International standards and references

- **Universal Declaration of Human Rights (UDHR):** document adopted by the United Nations General Assembly establishing fundamental rights to be universally protected.
- **Fundamental Conventions of the International Labour Organisation (ILO):** set of conventions that define the basic principles of labour rights, including freedom of association, elimination of forced labour, abolition of child labour, and elimination of discrimination in employment.
- **United Nations Global Compact (UNGC):** global initiative that encourages companies to adopt sustainable and socially responsible policies, aligned with ten principles in the areas of human rights, labour, environment, and anti-corruption.
- **OECD Guidelines for Multinational Enterprises:** recommendations for responsible business conduct, covering areas such as human rights, employment, the environment, anti-corruption, and consumer interests.
- **ISO 26000:** international standard that provides guidelines on social responsibility for organisations, promoting ethical and transparent practices.
- **SA 8000:** international standard that establishes requirements for fair and safe working conditions, including workers' rights, health and safety, and systems management.

- ISO 20400: international standard that provides guidelines for integrating sustainability into procurement processes, promoting responsible decisions throughout the supply chain.
- ISO 45001: international standard for occupational health and safety management systems, aimed at preventing accidents and occupational diseases.
- ISO 14001: international standard that establishes criteria for an effective environmental management system, helping organisations improve their environmental performance.
- ISO 9001: international standard that defines criteria for a quality management system, focusing on continuous improvement and customer satisfaction.
- ISO 22000: international standard that specifies the requirements for a food safety management system, ensuring food safety throughout the supply chain.
- FSSC 22000: certification scheme that combines ISO 22000 with additional technical specifications, globally recognised for food safety management systems.
- BRCGS (British Retail Consortium Global Standards): set of internationally recognised food safety and quality standards applicable to manufacturers, distributors, and retailers.
- IFS (International Featured Standards): international standards that guarantee the safety and quality of food and non-food products, applicable to all levels of the supply chain.