

FOOD SAFETY

- Complete the Health Questionnaire and if you have a foodborne illness, report it to your contact.
- Wear the protective clothing assigned to you on entry to the plant.
- If you are going into production, remove any jewelry or items liable to be lost.
- Respect the signage and rules posted in each of the areas.
- Drinking, eating and smoking are prohibited outside the designated areas.
- If your work involves the use of chemical products, you must inform your contact of the products you are going to use and give him/her a copy of the technical or safety data sheets.
- If your work is going to generate waste, inform your contact.

SECURITY

- You must keep your assigned identification visible.
- Do not separate from the group, do not enter places that do not concern your visit, at all times use the established paths to move around safely inside the plant and keep close to your contact person at all times.
- Do not touch machinery.
- Respect safety signage.
- If the alarm sounds, vacate the plant and go to the indicated meeting point.
- If you detect an anomaly of any kind, inform your contact person.
- No photos or videos may be taken in the production areas without authorization.

GENERAL RULES

- Access to any part of the facilities by minors is forbidden.
- Please be informed that a video surveillance system has been set up to prevent the intentional sabotage of our products.
- GRUPO EL CIRUELO complies with Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the guarantee of digital rights.

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

INFORMATION ON ALLERGENS:

These are 14 allergens that must be declared according to Royal Decree 126/2015:

1. Cereals containing gluten
 2. Crustaceans and crustacean products
 3. Eggs and egg products
 4. Fish and fish products
 5. Peanuts, peanut-based products and tree nuts
 6. Soybeans and soybean products
 7. Milk and milk derivatives (including lactose)
 8. Nuts and nut products
 9. Celery and products thereof
 10. Mustard and mustard products
 11. Sesame seeds or kernels and sesame products
 12. Sulphur dioxide and sulfites
 13. Lupins and lupin products
 14. Molluscs and crustaceans and products based on them
- None of the products handled in the company are on the list of allergens, although it must be taken into account that the proteins present in peach skin can cause allergic reactions in sensitive people.
 - If you are allergic to any of the above-mentioned substances, you should inform the company so that the appropriate measures can be taken (especially in the case of peach allergy).

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

FOOD SAFETY, FOOD QUALITY AND AUTHENTICITY POLICY

The objectives of our **Food Safety, Food Quality and Food Authenticity Policy of Grupo El Ciruelo-Agronativa S.L.** are as follows:

- **Customer satisfaction** by creating a culture within the organization that allows us to anticipate the needs of our customers, to serve them products with the required quality.
- To develop a **Food Safety Plan** based on the HACCP principles of the Codex Alimentarius and traceability, to transport and store safe, innocuous, legal and authentic products.
- **Monitor the authenticity** of products, analyze risks and seek solutions to control and prevent food fraud.
- Involve all staff in the **development and improvement of the Quality Management System**, as well as in the fulfillment of legal and regulatory requirements and customer responsibilities, fostering a culture of Food Safety within the company.
- To have the mechanisms defined within the organization that allows **quality objectives** to be established and achieved.
- To provide the means and cover the **training needs** of all personnel following basic ethical work requirements within a culture of food safety and food security.
- To have **human resources** of recognized experience that, together with the appropriate technical means, ensure the uniform quality of our product.
- **Continuous improvement** of processes and staff training as a way to minimize errors.
- The implementation of a **Food Defense system**. The aim of this system is to avoid intentional or deliberate acts of contamination or alteration of products by means of biological, chemical, physical or radioactive agents or allergens.
- Implement **the Food Safety and Quality Culture** at all levels of the Organization and be **committed to improving** the Food Safety and Quality Culture through the plan developed for this purpose and its monitoring.

Management approves and undertakes to review, update and disseminate this policy to all levels of the organization, suppliers and third parties that have a relationship with the company.

ENVIRONMENTAL SUSTAINABILITY POLICY

Grupo El Ciruelo-Agronativa S.L. has established and implemented an Environmental Management System in all the companies of its group, based on the requirements of the LEAF MARQUE standard, on compliance with legislation and on continuous improvement, within a framework of transparency towards its clients, local groups, and authorities. This commitment also extends to all the companies with which we subcontract our services.

In order to fulfill our commitment and achieve our stated objectives, it has established the following fundamental principles:

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

- Working in a way that respects the environment and ensuring its protection, as these are determining factors in the development of our activity.
- To ensure compliance with the environmental legal requirements applicable due to the activity carried out and the geographical location, as well as the requirements voluntarily assumed by the organization.
- Minimize the environmental effects produced because of the activity we carry out on our farms, in relation to the production of waste, dumping and atmospheric emissions.
- To favor the natural development of the adjacent flora and fauna.
- To carry out integrated management, allowing maximum optimization of both natural resources (water, soil, etc.) and energy resources. Likewise, also acquiring the commitment to reduce the consumption of raw materials.
- Promote the use of renewable energies, especially when it comes to the design or reform of any infrastructure.
- Bring the LEAF MARQUE Protocol and Environmental Management closer to the entire organization and subcontracted services to encourage the participation of all employees and companies and include suggestions for improvement proposed by them in order to promote continuous improvement.
- To achieve customer satisfaction.
- To prioritize prevention criteria over correction criteria in our principles of action.
- Maintain the awareness and sensitization of all our employees, promoting their environmental training.
- To carry out a periodic annual evaluation of the environmental aspects derived from our activity, for the purposes of maintenance and continuous improvement of Environmental Management.
- Define specific and measurable annual objectives within our environmental policy.
- To try to reduce waste production, reuse as much waste as possible and recycle waste for which reuse is not possible.
- Ensure the safe and effective removal and disposal of those wastes that require it.

All the staff of **Grupo El Ciruelo-Agronativa S.L.** is responsible for the achievement of the environmental requirements, so the environmental management is the result of the effort of all of them.

OCCUPATIONAL RISK PREVENTION POLICY

The Management of Grupo El Ciruelo-Agronativa S.L., aware that Occupational Risk Prevention is as important as Production, is promoting this service to the maximum, with the aim of improving working conditions and reducing the accident rate, providing the company with the necessary human and material resources. Furthermore, it considers it essential that the company's Occupational Risk Prevention Policy is based on the following criteria:

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

- The human element is the foundation of the company and its care is a constant concern of the company. Workers shall receive regular written health and hygiene training, which shall be repeated for new or appointed workers.
- A safe and hygienic working environment shall be provided, taking into account the prevailing knowledge of the industry and any specific hazards. Necessary measures shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work by reducing, as far as reasonably practicable, the causes of hazards inherent in the working environment.
- The prevention of occupational hazards is a common responsibility of all employees and the level of responsibility depends on the hierarchical level of each employee in the company's organization chart.
- Behavior in the area of health and safety must be a line of conduct, which, although it is relevant to the line of command, must be a necessary feeling for everyone.
- Prevention practices, within the general framework of workers' health and safety, are a human and moral obligation.
- The occurrence or not of an accident should not be considered as a matter of chance, but as the result of one or more determining factors, in which the will to act in accordance with the Safety Regulations plays a fundamental role.
- The company's goal, within the scope of Occupational Risk Prevention, is to activate and strengthen everyone's feeling and spirit of safety, which undoubtedly leads to optimizing working conditions, tending to achieve the fundamental objective of maintaining the integrity and health of its workers.

The general objective we have set ourselves could be set under the slogan:

"TO MAKE OUR COMPANY A SAFE AND PLEASANT PLACE FOR EVERYONE".

And in order for this motto to be in line with our daily business, we recognize and accept that:

- Accidents are preventable, accidents that damage our company do not happen by chance, they are caused and produce significant disruption.
- Accidents are caused by unsafe conditions of the facilities and/or unsafe acts of the workers.

Well, given that all work involves safety in its execution, it must be the managers who plan, execute and supervise the work who are best placed to ensure that it is carried out with the appropriate preventive measures.

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

This does not mean, however, that only managers are responsible for the unsafe acts of their subordinates. It is important that each employee understands that responsibility for his or her own safety is part of the requirements of his or her job.

To this end, the management of the company is committed to enforcing safety standards on all employees of the company, as this can only be beneficial for all.

In order to move in the direction of these principles. The prevention plan includes as objectives, the implementation of a series of actions aimed at eliminating or reducing risks and improving working conditions in each of the existing jobs within the company, which must be fulfilled by each of the workers of this company in the part that affects them.

Finally, we would like to say that we are all involved in achieving the objectives set out in the Prevention Plan.

Therefore, we hope that this document will be for each worker, as it will be for us, a regular working tool that contributes to the elimination of accidents and the humanization of work. It is a worthwhile effort for which we are grateful.

The Management approves and undertakes to review, update and disseminate this policy to all levels of the organization, suppliers and third parties who have a relationship with the company.

SOCIAL POLICY

Grupo El Ciruelo-Agronativa S.L is committed to developing and maintaining business relationships based on the fair treatment of all workers involved in the supply chain and compliance with the Code of Conduct.



chain.

We are GRASP (Risk Assessment in Social Practices) certified. This is a voluntary module that accompanies the GLOBAL G.A.P. Certification, covering four main issues: workers' voice, human and labor rights reporting, human and labor rights indicators, and protection of children and young workers.

In addition, we regularly conduct SMETA assessments (ethical trade audits) following guidelines designated by the SEDEX organization, which provides working tools to improve responsible and ethical business practices in the global supply

Grupo El Ciruelo-Agronativa S.L. declares that all personnel are treated in accordance with the following principles:

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

1. In accordance with the provisions of Spanish labor legislation, the Collective Bargaining Agreement of the applicable field of the province and the Universal Declaration of Fundamental Human Rights.
2. According to the **ILO Core Labor Conventions**:

- a. **ILO Convention No. 111 concerning Discrimination in Respect of Employment and Occupation and ILO Convention No. 100 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value.**

There is no discrimination (distinction, exclusion or preference) based on race, caste, nationality, religion, disability, gender, sexual orientation, maternity, age, political opinion, trade union membership, political party membership or social origin.

Rates of pay set without discrimination based on sex are designated to ensure the principle of equal pay for work of equal value.

Workers have equal access to vocational training facilities, working conditions, social benefits and promotion opportunities.

Recruitment procedures are fair and transparent. There is no discrimination against anyone wishing to work on the above grounds.

- b. **The two ILO Conventions on child labor: Minimum Age Convention No. 138 and Worst Forms of Child Labor Convention No. 182.**

Compliance with child labor regulations is promoted, where the minimum working age (16 years) is respected at all times. Underage employees, if any, will not perform night work or work that is considered hazardous.

- c. **Forced Labor Convention, Convention No. 29 and Abolition of Forced Labor Convention, No. 105.**

The work is voluntary. Employees are not obliged to perform any kind of work.

No employee's own documents remain in the custody of the employer.

No withholding of wages or part thereof without the explicit permission of the employee.

No disciplinary measures such as corporal, mental, physical punishment or verbal abuse.

No unfair deductions from wages.

Disciplinary measures, if any, are fair, transparent and recorded.

Overtime is voluntary.

- d. **Convention No. 87 concerning Freedom of Association and Protection of the Right to Organize and Convention No. 98 concerning the Application of the Principles of the Right to Organize and to Bargain Collectively.**

Collective bargaining is permitted by management.

- d. **Convention No. 87 concerning Freedom of Association and Protection of the Right to Organize and Convention No. 98 concerning the Application of the Principles of the Right to Organize and to Bargain Collectively.**

Collective bargaining is permitted by management.

Employees have the right to establish or join any organization of their choice.

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

Union members are guaranteed access to facilities at least outside normal working hours.

e. Convention No. 99 requires the establishment or maintenance of adequate methods of fixing minimum rates of wages for workers employed in agricultural undertakings.

3. Risk groups, such as pregnant or breastfeeding women, children under the age of 18, employees with disabilities or medical conditions that demonstrate special sensitivity or vulnerability, shall not carry out work that affects their development or safety.
4. Underage workers shall not work overtime in accordance with legal regulations.
5. We act in accordance with the applicable agreement regarding maternity, sick days and retirement and comply at least with the country's social security legislation.
6. There is a legal representative of the workers and a Works Council. They have knowledge of and access to the country's legal regulations and hold regular meetings. Workers can turn to these figures, as well as to the person responsible for Human Resources, to find out about the conditions of their contracts, to present complaints or to communicate any dissatisfaction.
7. Complaints may be formalized in writing on the Workers' Complaints form, which will be available at the work centers, and must be placed in the mailbox or delivered by hand so that it can be evaluated by the company's management and processed within a period of less than one month. Complaints that are made verbally and are manageable will be dealt with immediately.
8. Written contracts are given to all workers, indicating the working conditions (duration, working hours, salary, etc.). Wages, as well as breaks and working hours, are in accordance with the contract, legal regulations and collective bargaining agreements. After the time specified in the agreement, employees are entitled to an open-ended contract. Within the company's possibilities, the creation and stability of employment is encouraged.
9. All workers are guaranteed all measures for the protection and prevention of occupational health. There is an Occupational Risk Prevention Policy.
10. With regard to the supply chain, the company ensures compliance with the corporate social responsibility of our suppliers.

Grupo El Ciruelo-Agronativa S.L. declares its willingness to solve any problem in cooperation with the employees' representation, as well as to report immediately to the Certification Body any indication of violation of these principles and to take the appropriate corrective measures.

ANTI-CORRUPTION POLICY

Grupo El Ciruelo-Agronativa S.L. has established an anti-corruption policy to ensure the transparency of our employees' actions with our stakeholders.

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

The company will not tolerate corrupt actions and to this end, we have developed the following anti-corruption measures:

Anti-corruption reporting mechanisms:

- Any employee may report conduct that is contrary to this anti-corruption policy.
- Management and the Works Council will be responsible for assessing the situation. If appropriate, sanctions will be established.

Mechanisms for staff consultation in the event of doubtful actions:

- Any employee may raise doubts and/or suggestions regarding compliance with this anti-corruption policy.
- Concerns will be communicated to the management of the company and the management will be responsible for responding, either individually or in conjunction with the Works Council.

Anti-bribery, extortion, embezzlement, corruption and fraud practices within the company:

- The company expressly prohibits any undue or dishonest payment, in any form, made or received by employees representing the company from any person, natural or legal, made to obtain any influence in the initiation or maintenance of a business relationship involving Grupo El Ciruelo-Agronativa S.L, its employees, representatives or related persons.
- The following are considered bribery methods:
 - Bribery requests or suggestions by Public Administration officials.
 - Public Administration officials with whom Grupo El Ciruelo-Agronativa S.L. has a relationship and have a known history of having received payments contrary to what is established in this Anti-corruption Policy.
 - Any request for extraordinary or excessive payments, such as overestimated charges, irregular advances or commissions, requests for payments in favor of third parties, payments to foreign bank accounts, in cash or other forms of transfer that are difficult to trace.
 - Third parties with whom Grupo El Ciruelo-Agronativa S.L. has the purpose of entering commercial relations and who demand excessive amounts for commissions.
 - Any other similar case that goes against the principles enunciated through this Policy, ethics or generally accepted business customs.

Criteria for issuing and receiving gifts and hospitality:

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

- The employees of Grupo El Ciruelo-Agronativa S.L. will not be allowed to receive or issue gifts from their interest groups without prior authorization from the Management and/or the Works Committee. Only courtesy gifts from clients or suppliers will be acceptable.

Ways of detecting and limiting conflicts of interest:

- There is a register where it is indicated if there is any family or affective relationship of any employee or member of the Management of Grupo El Ciruelo-Agronativa S.L. with any of the interest groups. If this is the case, they will not be able to make agreements or decisions with respect to them.

Transparency with regard to contributions to political parties:

- The company maintains independence in this regard and any proposal or relationship involving political parties or institutions linked to them will be supervised by the Management and the Works Committee.

In the event that situations relating to the above scenarios occur, an analysis of the situation and outcome will be recorded. In most cases, these actions will result in the unilateral termination of the employment contract, the breach of which is considered to constitute a serious breach of the obligations under the contract for all legal purposes. All recorded cases of corruption shall be publicly accessible.

Management approves and undertakes to review, update and disseminate this policy to all levels of the organization, suppliers and third parties who have a relationship with the company.

FOOD DEFENSE POLICY

Grupo El Ciruelo-Agronativa S.L., in its Food Defense Policy, defines the commitment to carry out our activity within the parameters of SAFETY in the face of any intentional attack or sabotage by both personnel outside the company and employees, the consequence of this situation being harmful to the health of workers and/or consumers.

The Management of **Grupo El Ciruelo-Agronativa S.L.** has established the following fundamental principles:

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

- The recruitment process begins with the submission of job applications or Curriculum Vitae via the web and the need to increase the staff.

In order to determine whether a candidate is suitable, the Human Resources Department has to check:

- That the data shown is true and correct (applicant's name is verified by photo identification (locally issued ID card, driver's license, passport, etc.).
 - That the applicant's current address is correct
 - Previous experience through work history and employment history verification.
 - References from previous job position through phone call and personal references, if available.
 - Experience of key personnel every 12 months.
-
- If the result is positive, the necessary documentation will be requested to carry out the worker's registration, as described in Procedure P.28 HUMAN RESOURCES AND PERSONNEL.
 - Only authorized personnel and visitors are allowed access to the facilities, and in all cases they must access the inside of the production and dispatch facilities without any personal objects such as bags, rucksacks, food bags, etc. They shall be deposited in the canteen, changing rooms or reception.
 - Only authorized personnel shall have access to the company's Information Systems, as described in Procedure P.01 Management Systems Documentation Management.
 - All security procedures shall be documented as a Policy or Procedure and communicated to key personnel.
-
- The Food Defense policy shall be reviewed every 12 months unless prior reviews are required due to updates.

Management approves and undertakes to review, update and disseminate this policy to all levels of the organization, suppliers and third parties involved with the company.

LOGISTICS POLICY

Grupo El Ciruelo-Agronativa S.L., in its Logistics Policy, defines the commitment to carry out our activity within the parameters of SAFETY in the event of any intentional attack or sabotage during the process of loading goods, the consequence of this situation is harmful to the health of workers and/or consumers.

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

This policy is related to other corporate policies such as the Quality Policy or the Safety Policy, which together help to fulfil the commitments and achieve the established objectives.

El Ciruelo Group Management has established the following fundamental principles:

- As described in P.28 Human Resources, by the security guard at the entrance, the arrival and departure of all vehicles will be recorded to include the driver's name, number plate number, driver's license number, truck license number, number of persons, time of arrival, time of departure and reason for the visit. The log is kept for at least 30 days.
- The facility shall have a container/trailer inspection process that includes looking for signs of modification and undercarriage inspection for concealed devices or packages, as described in IT.29 Inspection of Cargo Vehicles.
- Where requested by the customer, the facility affixes an ISO 17712 security seal to the container or trailer immediately after loading is completed. Only authorized control personnel will have access to the seals.
- To prevent tampering of the goods, production, dispatch and quality personnel will check for tampering. In addition, the warehouse areas are monitored by security cameras.
- A procedure (P.25) is in place to ensure that the data used to create freight documents is accurate, legible, complete and Protected against tampering or loss ".
- Cargo shipping documents are stored in a secure location to prevent tampering.
- The logistics policy will be reviewed every 12 months unless prior revisions are necessary due to updates.

Management approves and undertakes to review, update and disseminate this policy to all levels of the organization, suppliers and third parties involved with the company.

CROP HEALTH AND SAFETY POLICY

At El Ciruelo Group we are aware of the importance of the sustainable use of phytosanitary products and the conservation of the environment.

El Ciruelo has established and implemented an Environmental Management System in all the companies of its group, based on the requirements of the LEAF MARQUE standard, in compliance with legislation and continuous improvement, within a framework of transparency towards its customers, local communities and authorities. This commitment also extends to all the companies with which we subcontract our services.

This is why we have developed our **Crop Health and Safety Policy**, which sets out the following objectives:

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa

- We carry out an annual report on pesticide residue monitoring per crop.
- We implement pesticide residue management, which includes laws and regulations, monitoring system, standards system, quality and safety of agricultural products.
- We carry out integrated management of our farms. This is achieved by creating a personal link with the farm, managed by an agricultural technician, who gives the necessary guidelines to a team of people he trusts to carry out the cultivation work.
- We select our varieties according to their resistance to possible pests and diseases. We develop a treatment program, with which we aim to optimize the monitoring and control of pests and diseases.
- All our applications are done according to legislation (dosage, application time, etc.) and following the codes of good agricultural practices.
- To ensure that our companies comply with these requirements, we have a team of technical experts who monitor our crops on a continuous basis. This team is in charge of implementing IMP techniques. In this way we ensure that we only use phytosanitary products when there is no alternative with the same efficacy.
- We carry out biotechnological control by mat disruption. This technique is based on the use of diffusers that disperse synthetic sex pheromones specific to the pest to be controlled.
- Mass trapping is another of the biotechnological controls we carry out. We place a large number of traps with an attractive substance, the aim of which is to capture as many harmful organisms as possible, thus reducing the population.
- All products applied to our crops are approved by national legislation for that crop.
- Our phytosanitary warehouses have been designed to comply with legal requirements, preventing any possible adulteration or contamination of the product.
- Our applicators are duly trained by legal requirements and have the necessary PPE at their disposal to always guarantee their safety.
- All our equipment, together with the machinery, and the equipment we use, is fully equipped with the necessary PPE to guarantee their safety.
 - Always use the dosage indicated on the label.
 - Select products that respect the useful fauna.
 - Use appropriate and well-maintained equipment.
 - Prevent fungal diseases with preventive fungicides, always following the dosage indicated on the label.
 - Use herbicides whenever and wherever necessary.
- We use innovative tools such as PHYTOBAC®, with which we ensure that pollutants from pesticide residues do not reach nearby water bodies.

All of us at **Grupo El Ciruelo-Agronativa** are committed to these principles, and it is our responsibility to put them into practice. Management will promote improvements in health and safety and allocate the necessary resources to ensure the successful implementation of the **El Ciruelo-Agronativa** Group's crop health and safety policy.

JOSÉ FRANCISCO VELASCO GARCÍA

CEO Grupo El Ciruelo-Agronativa