

## **OBJECTIVES AND SCOPE OF APPLICATION OF THE CODE OF ETHICS AND CONDUCT**

Berrysmart's Code of Ethics and Conduct is the document that includes a set of principles governing the activity of the Company and a set of rules of an ethical and deontological nature to be observed by the respective members of the Governing Bodies and all Employees in their relations with Customers and Suppliers.

It is also aimed at third parties contracted by or acting on behalf of Berrysmart in cases where the latter may be held responsible for their actions.

The Code was created with the fundamental objective of:

- a) Sharing the principles that guide the Company's activity and the rules of an ethical and deontological nature that should guide the behaviour of all Employees and Corporate Bodies and promote the adoption of ethical and deontological principles and practices by our Partners;
- b) Promoting and identifying the adoption of the principles of action and behavioural rules defined in this Code, namely the Company's values in the relations between Employees and Corporate Bodies;
- c) Consolidating Berrysmart's institutional image, characterised by Determination, Dynamism, Enthusiasm, Creativity and Openness.

### **Respect for the Law**

Berrysmart conducts its business with respect to compliance with the applicable laws of the countries where it operates.

Berrysmart respects Human Rights within the Universal Declaration of Human Rights framework and complies with the international treaties to which the countries where it operates are a party.

### **Honesty and Integrity**

Berrysmart conducts its activity with honesty, rigour and integrity, and does not give or receive, directly or indirectly, bribes or any other improper advantages for its business.

### **Corporate Social Responsibility**

At Berrysmart, we seek to balance the relationship between the necessary economic prosperity and the active contribution to social development and environmental preservation in the regions where we are present.

**We assume five pillars that are transversal and present in the Berrysmart culture:**

1. **PROMOTING HEALTH THROUGH FOOD** - Improving consumers' quality of life through food, investing in product quality and innovation, promoting food safety, and providing trustworthy service.

2. **RESPECT THE ENVIRONMENT** - Berrysmart is committed to conducting its business environmentally conscious and respectfully. Its objective is to guarantee that its processes and products have the least possible adverse impact on the environment, promoting, in particular, the reduction, reuse and treatment and recycling of waste and packaging, making efforts to reduce and prevent the production of pollutant emissions and promoting the rational use of material and energy resources.

3. **BUYING WITH RESPONSIBILITY** - We seek to incorporate ethical and environmental concerns into the supply chains to encourage a gradual and sustained improvement in the impacts of our activity.

4. **SUPPORTING INVOLVING COMMUNITIES** - Our Social Responsibility policy has a cultural patronage component, supporting projects to preserve and disseminate the historical and cultural heritage of the communities in which we operate.

5. **BEING AN EMPLOYER OF REFERENCE** - We have defined three major areas of action to support our employees, health and well-being, education and social support, thus assuming a relevant role in developing initiatives that seek to meet the needs and expectations of employees.

### **Independence from Political Parties**

Berrysmart does not support political parties or their representatives or contribute financially to groups that may support partisan interests.

### **Citizenship**

Within the scope of its socially responsible activity, Berrysmart can make public its position in matters that affect the communities where it is integrated and the businesses it carries out.

### **Cooperation with Official Entities**

Berrysmart is encouraged to collaborate and respond to requests from the Government and other public entities to supply information, comments or contributions on issues relevant to its business and the communities where it operates, namely by supporting the development of legislative or regulatory proposals related to its business areas.

### **Our Customers**

Berrysmart is committed to constantly offering its customers and consumers diversity of choice at competitive prices while pursuing the highest safety standards.

### **Product Quality and Safety**

Berrysmart establishes and determines the quality standards compliance by its collaborators and suppliers. By quality standards, we understand the instituted manuals, procedures, norms and rules that in some way influence the quality of the products and services available to our clients.

### **Hygiene and Safety of the Installations**

Berrysmart is committed to providing its customers with quality standards of construction, hygiene, health, well-being and safety.

### **Our Staff**

Berrysmart is committed to providing its employees with a healthy and pleasant working environment and fair and adequate remuneration to promote their motivation to work and their sense of personal and professional achievement.

We expect our employees to comply with the principles and standards of this code of conduct and a high level of moral integrity, loyalty and ethical behaviour in all areas of action.

### **Career Development and Non-Discrimination**

We are committed to guaranteeing employees fair remuneration and personal and professional development based on merit, qualifications and equal opportunities, regardless of their ancestry, gender, sexual orientation, religion, age, marital status, family situation, nationality, ethnic origin, disability, political or ideological beliefs and trade union membership.

### **Safety, Health and Welfare**

Berrysmart ensures its employees a safe and healthy working environment and conditions, prohibiting all forms of harassment, bullying or mobbing and disseminating the principles, values and standards necessary to maintain and consolidate a culture of risk prevention in the workplace.

### **Freedom of Association**

Berrysmart recognises the various forms of freedom of association of its employees, namely those of a professional, recreational and socio-cultural nature, as an expression of the principles of responsibility, solidarity, sharing objectives and interests, community spirit and mutual help, which are inherent to human nature and are the source of the development, modernisation, identity and cultural affirmation of its reality.

### **Respect for the Intimacy of the Private Life of the Employee**

Berrysmart assures all its employees the right of reserve and confidentiality regarding their private life, as well as information of a personal nature and of a non-professional character, namely that which concerns their personal and clinical data.

## **Conflicts of Interest, Confidentiality and Offers**

Berrysmart employees cannot negotiate for their own account or in competition with the same. It is also forbidden to obtain benefits, advantages or personal favours by virtue of the position held or the functions carried out.

The employees must keep secret and keep confidential all the information and facts relative to the Company's activities to which they have access, and that is not of public or notorious knowledge.

Berrysmart employees cannot accept any offers, gifts, benefits or invitations of a personal nature from third parties for themselves, their family members or on behalf of another person. All unauthorised offers, which cannot be refused or returned, revert to the Company.

No employee may offer, give or receive any gift or payment to a third party that is or could be considered a bribe or corruption.

## **Loyalty, Exclusivity and Impediments**

In accordance with the principle of loyalty that must govern their conduct, employees may not provide consultancy or technical assistance to Berrysmart suppliers, customers or service providers unless previously authorised.

The use for their benefit of Berrysmart property or means made available to employees for their duties is not permitted.

Berrysmart requires that its employees, except in exceptional circumstances arising from their status, contractual relationship, or other applicable circumstances duly recognised and authorised, carry out their activity exclusively for the Group, abstaining from any action that affects the quality of their performance and their duties as employees.

## **Use of Electronic and Computerized Media**

Electronic mail, the internet, computerised media or any other electronic support, equipment or material of a similar nature made available to employees for the performance of their work shall be used, always taking care to ensure the safety of the information handled and the dissemination of illicit, illegal or inappropriate messages shall not be permitted.

## **Our Suppliers and Commercial Partners**

Suppliers and commercial partners are essential to maintain the high-quality standards we pursue.

## **Fair Trade Practices**

Berrysmart adopts fair trade policies aimed at the protection of consumer rights.

Berrysmart supports all activities that tend to prohibit the existence of activities that restrict free trade, unfair practices or abuse of a negotiating position.

Berrysmart operates fairly, in full respect of the contractual conditions agreed upon, with all its suppliers and partners and expects the same behaviour from them.

### **Competition**

Berrysmart believes in strong and fair competition and supports the development of appropriate competition laws.

### **Selection of Suppliers and Business Partners**

Berrysmart selects its business partners, seeking to relate to entities that share the same framework of ethical principles that it follows.

The selection of suppliers is carried out impartially based on criteria that are based on quality, innovation capacity, price, supply capacity, performance, reliability, continuity and sustainability over time.

Berrysmart supports and develops activities with national business partners in the countries where it operates, who comply with the defined selection criteria, to promote the development of the agricultural and industrial sectors to improve competitiveness.

Suppliers and other business partners are required to commit and adhere to integrated waste management systems in compliance with the applicable laws.

### **Ethics Committee**

This body monitors, with the impartiality and independence that makes up Berrysmart, the dissemination of and compliance with the Berrysmart Code of Conduct.

Should you have any questions on applying any of the rules set out in this Code of Conduct, you may contact the Ethics Committee, with a confidentiality guarantee, through [administração@berrysmart.pt](mailto:administração@berrysmart.pt).

### **Complete and Transparent Information**

Berrysmart rigorously complies with the duties of information before the regulatory entities and the market in general, doing so in a timely, complete, transparent and reliable manner.

### **Financial Information**

The Annual Accounts Report, as well as Berrysmart's financial records and supporting accounting documents, accurately describe and reflect the nature of the underlying business in a true and transparent manner.

Ladoeiro, 16th December 2021