



## CODE OF CONDUCT

ECOM Agroindustrial Corp. Limited and its group companies (“**ECOM**”) is committed to conducting its business in an ethical, legal, environmentally and socially responsible manner. ECOM works continuously to improve the sustainability of its operations as demonstrated by its Sustainable Management Code and its Supplier Code of Conduct. We expect our employees to share our commitment to doing business in a responsible, sustainable and ethical manner. The following is our Code of Conduct (the “**ECOM Code**”) which we expect our employees, agents and representatives to act in accordance with to further ECOM’s business. The ECOM Code is mandatory and we will not use any representative or agent to circumvent it.

### ECOM’s Code of Conduct

**I comply with the ECOM Code.** My actions must always be lawful and in compliance with ECOM Policies. ECOM sets a high bar for its business operations around the globe and expects employees to act with integrity in all matters. ECOM is committed to conducting business with honesty and integrity and we expect all our employees, contractors, agents and other third party representatives to maintain high standards. If I am in any doubt as to how to act or with regards a matter that has arisen, I know I can raise concerns in confidence in accordance with the Ethics and Compliance Policy.

**I act with integrity.** ECOM strives to work against corruption in all its forms, including extortion and bribery and ECOM operates a strict policy of zero tolerance in this respect. I deal with all business partners in a fair, honest and respectful way acting in compliance with local laws and ECOM Policies. I do not offer or accept bribes or inappropriate gifts and I work to promote fair competition and integrity in all my business dealings.

**Sustainability is a core business strategy.** ECOM strives to protect the environment through its numerous sustainability programs and actively seeks to reduce the use of energy, water, waste created and our carbon footprint. ECOM values and fosters relationships throughout the supply chain from farmer to customer. In my role, I keep our social and environmental responsibilities at the core of what I do.

**I treat all people with respect and act to prevent harassment and bullying.** ECOM respects the United Nations’ Universal Declaration of Human Rights and International Labor Standards. ECOM does not discriminate in its employment practices, nor use child or forced labor. ECOM is dedicated to fostering an environment where all employees’ well-being is safeguarded and equality and diversity is promoted. ECOM is committed to providing safe and healthy working conditions and an atmosphere of open communication. I act to support others to grow and work in ways to bring out the best in all. If I have an employment related concern, I know I can raise it in confidence following the HR Grievance Policy.

**I keep honest, accurate and objective records.** Accurate records are critical to making sound business decisions and are essential to ECOM’s reputation and the ongoing success of its business. I will never knowingly create records that are false or inaccurate and will inform relevant counterparties if I become aware of any mistakes.

**I will support ECOM to protect its data and company information.** ECOM relies on its employees to protect its technologies, intellectual property, data (including personal data) and commercially sensitive information. I take individual responsibility for the proper use of our business property, including IT systems, materials, facilities and equipment.