



CODE OF BUSINESS ETHICS

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I. General Provisions

The management policy of „Kuminiano Frut” Ltd. is focused on: consciously maintaining high-quality operations to fully satisfy customer requirements concerning the quality and safety of produced products, while ensuring safe and healthy working conditions and protecting the environment.

The Code of Business Ethics aims to establish the norms that define the behavior of all employees within the company during the performance of their duties, in their relationships with each other and with the company’s owners, as well as in their interactions with personnel from other companies – clients, partners, and government authorities.

As members of the UN Global Compact and the Bulgarian Network of the UN Global Compact, we are committed to implementing the UN Guiding Principles on Business and Human Rights in the conduct of our business activities.

In this regard, with the present Code of Ethics, the Management of „Kuminyano Frut” Ltd. aims to support the active policy pursued in the following areas:

1. Ensuring priority is given to the quality and safety of the products produced.
2. Developing a new mindset and appropriate actions for every member of the company, motivating each individual to personally and collectively maintain and enhance the quality of performed activities and their results across all company units, while efficiently and effectively utilizing the available material, human, and financial resources according to needs and requirements.
3. Striving for continuous improvement in the company’s development.
4. Collecting and processing information from customers regarding product quality and assessing how closely it meets their needs and expectations.
5. Continuously enhancing the qualifications and motivation of personnel for high-quality work.
6. Complying with rules for healthy and safe working conditions, as well as sanitary, hygiene, and environmental standards, according to national and international regulations.
7. Effectively managing health and safety risks, minimizing risks to personnel and other stakeholders, preventing environmental pollution, and avoiding work-related illnesses and injuries among employees.
8. Periodically analyzing national and international regulatory documents and all other documents the company has committed to comply with, which are related to product quality, ensuring healthy and safe working conditions, and environmental protection; evaluating their impact on company operations, and continuously monitoring compliance with all obligations imposed by such documents.



II. Core Principles and Values of the Company

1. Professionalism, Legality, and Equality

- The organization conducts its activities in accordance with the current legislation of the Republic of Bulgaria, professional ethics, and its internal rules and regulations. Therefore, pursuing the company's objectives must not conflict with the principles of honesty and integrity. Each employee is responsible for fulfilling their duties. Compliance with labor legislation, health and safety standards, the laws regulating the company's activities, and the internal rules is explicitly required.
- Any form of benefits or gifts to employees intended to influence independent judgment or to compromise strict performance of duties, or to induce actions contrary to the company's interests, is strictly rejected.
- High-quality and reliable performance in every area relies on the necessary professional qualifications and continuous improvement. Recognizing this, management is committed to developing human capital through participation in professional seminars and training programs.
- Employees' achievements and contributions are evaluated based on competence, qualifications, workload, quality and timely execution of duties, contribution to enhancing the company's reputation, profitability of its activities, and adherence to the rules of this Code.
- All employees actively participate in training plans provided by company management aimed at their professional and skill development, to improve and update their knowledge and abilities.
- In all internal and external company relationships, any form of discrimination based on age, race, ethnicity, nationality, political beliefs, religion, gender, sexual orientation, or health condition is avoided.
- The company policy strictly prohibits the exploitation of child labor.

2. Behavior Preventing Corruption

- A fundamental requirement at "Kuminiano Fruit" Ltd. is the obligation of all employees, at all levels, to adhere to principles of integrity and morality, strictly comply with the laws of the Republic of Bulgaria, both in their interactions with clients and partners, as well as with all institutions in the country in the course of their official duties.
- Employees of "Kuminiano Fruit" Ltd. must not create conditions that allow public officials to exploit their authority or official position for personal gain or any other self-serving purpose.
- Employees of "Kuminiano Fruit" Ltd. must ensure that neither they nor public officials with whom they have official contacts are placed in financial or other dependency situations concerning the company or third parties, which could influence the performance of official duties or compromise professional judgment on specific matters.



- Employees of “Kuminiano Fruit” Ltd., who become aware of facts or circumstances indicating a conflict of interest, must notify their immediate supervisors.

3. Confidentiality and Competition

- The organization guarantees confidentiality in the use and storage of provided personal information in accordance with the Personal Data Protection Act. Employees are prohibited from using this information for purposes unrelated to the performance of their official duties.
- Equally important is maintaining full confidentiality regarding company information and any information that could threaten the organization’s interests, competitiveness, or reputation. Employees are required not to disclose, share, or publicize such information, including technical details—such as expenses and/or asset acquisitions, pricing, marketing strategies, and others.
- All confidential company information is managed through appropriate internal procedures that ensure it reaches only authorized persons and entities, and that its dissemination is solely for organizational purposes.
- The organization supports fair and lawful competition and expects its employees to act with honesty and integrity in dealings with partners and competitors.
- The use of information obtained through unofficial channels is strictly prohibited in the context of fair and loyal competition in sales and price communications.

4. Safe Working Conditions and Environment

- The organization is responsible for the health and well-being of all employees and ensures safe working conditions while respecting personal dignity. Compliance with laws regulating the company’s activities, as well as with the internal rules and standards adopted by the organization, is strictly observed.
- Environmental protection is a fundamental principle in the company’s operations and a primary asset.
- Employees adhere to conduct rules aimed at protecting the environment (including the proper use of equipment, machinery, and facilities) to achieve the company’s objectives in this area.
- All decisions and activities are aligned not only with existing environmental legislation but also with the latest trends in scientific research and best practices in the field.

III. Standards of Communication and Conduct

1. With Clients

All contractual relationships and interactions with the company’s clients are based on principles of fairness, professionalism, and the highest degree of cooperation.

Key responsibilities of the staff include understanding and ensuring client satisfaction, as well as pursuing continuous improvement.



2. With Contractual Partners and Suppliers

- Cooperation with contractual partners is an integral part of the company's operations. Therefore, principles of impartiality and mutual respect are of particular importance when interacting with them, providing clear instructions regarding assigned tasks, and ensuring timely payment of amounts stipulated in contracts.
- Contracts concluded by the company include clauses requiring compliance with ethical rules.
- The selection of collaborators and suppliers must be based on clear and non-discriminatory procedures. The organization relies solely on criteria based on the competitiveness and quality of the products and services offered by potential partners, as well as the partners' adherence to the ethical standards outlined in this Code.
- No conditions should be created that could facilitate money laundering.

3. With Public Institutions, Commercial and External Communications

- All relations between the Organization and public institutions are based on principles of integrity, transparency, cooperation, and non-interference, as well as full respect for the role of each individual entity. Any behavior that could be interpreted as underhanded or contrary to these principles is considered unacceptable.
- The company does not support any events or initiatives that are entirely or predominantly political in nature.
- Supporting the community in which the Organization operates is considered a moral obligation and an expression of social responsibility. In this regard, the Organization provides assistance to local educational and childcare institutions and sponsors cultural and public events organized by the Municipality.

4. Internal Corporate Communication

4.1 Personal Responsibilities and Duties

- The personal conduct of each employee is a key factor for the successful development of the Organization and the achievement of its goals.
- Employees must avoid any actions that could damage the prestige or reputation of the Company.
- In their interactions, employees must act in the best interest of the Company, following established rules for positive behavior, and respecting the honor and dignity of others.
- Among themselves, employees are considered equal. Relationships are based on trust, tolerance, ethics, and mutual assistance. Personal disagreements are not subject to public debate. Conflicts, criticisms, and disagreements should be resolved through civilized methods and open communication.
- Personal insinuations and unfriendly behavior are deemed inappropriate. Submitting unjustified complaints or spreading defamatory statements about colleagues is unethical and unacceptable. All public statements must be objective and truthful.
- Any behavior that undermines the personal dignity and honor of employees is not allowed.
- While performing their duties, employees must respect the hierarchy, strive for objectivity and impartiality, take responsibility for their actions, and actively participate in resolving the Organization's problems.
- For all employees whose duties require a uniform, the Company provides the necessary work attire.



- Communication and information exchange within the Organization are structured according to the workflow, responsibilities, and authority corresponding to functional and hierarchical levels, and follow established operational procedures. Internal communication is primarily oral, complemented by written communication via email.

4.2 Management Commitment

- Management is committed to fully applying the shared corporate values under conditions of transparency, dialogue, and open exchange of opinions, ideas, and suggestions, in accordance with the requirements for a good employee, specialist, and manager.
- Management is responsible for ensuring compliance with legal and other regulatory requirements related to the Company's activities, providing information on upcoming changes and additions in national and international regulations, standards, directives, etc., and informing relevant personnel about these changes.
- Full respect for all human rights and personal freedoms is guaranteed. No forms of irresponsibility, duplicity, envy, gossip, lying, malice, or negligence are tolerated. Management strongly opposes any abuse of power or actions aimed at violating the dignity, mental, or physical health of individuals.
- The Organization undertakes all necessary measures to ensure the highest standards of quality, safety, occupational health, environmental protection, human capital development, and transparent cooperation with all stakeholders, both inside and outside the Company.
- Every staff member must be employed under a labor contract. No forms of exploitation are tolerated. Professional qualities of job candidates are assessed solely based on the Company's interests. Any form of discrimination in recruitment, management, or career development of employees is rejected. Throughout their employment, employees must receive clear instructions that support their work and allow them to perform it effectively.
- To ensure a high level of professionalism, the Organization must enhance employee qualifications by providing opportunities to participate in training courses and professional seminars, and by organizing such events internally.
- In the event of reorganization, the value of each employee is protected, with measures for training and professional retraining implemented as needed.
- Meetings, operational briefings, instructional sessions, and other similar activities are essential for effective internal communication, which is of critical importance to Management.

IV. Internal Regulations and Certificates

1. Integrated Management System

- To demonstrate the Organization's ability to provide products and services that meet customer requirements, an Integrated Management System has been developed and implemented in accordance with international standards ISO 9001, ISO 14001, ISO 45001, and IFS. The



system documentation is structured at three levels: Management Manual, Work Procedures, and Operational Instructions.

- The Manager delegates authority to the management personnel to achieve the Organization's objectives. All employees are expected to actively participate in achieving these objectives, continuously improving the effectiveness of the Integrated Management System.
- Each employee is responsible for fulfilling their duties. Upon noticing errors, omissions, or deficiencies, employees are required to correct them if within their authority or immediately inform their direct supervisor so that appropriate measures can be taken.

2. Other Key Company Documents

Other fundamental company documents regulating employee performance include:

- Internal Work Regulations;
- Internal Rules for Fair Competition in Sales and Price Communication.

V. Implementation of the Code

1. Adoption and Dissemination

The Business Ethics Code has been created and approved by the Organization's Management. Any future amendments must also be approved by Management.

Every employee, including newly hired staff, must be acquainted with the Code.

Complaints regarding violations of the Code can be submitted through the designated reporting box. Confidentiality of the reports is guaranteed.

For any collaborative activity to be successful and effective, uniform rules of conduct and interaction must be observed. These rules are based on the core values of the Organization and, even if they may seem self-evident, the Organization expects all employees and collaborators to act in accordance with them.

2. Violations

The rules of this Code apply insofar as they do not contradict the Labor Code and other applicable legislation.

In the event of a breach of the principles of the Business Ethics Code, Management must take disciplinary measures against the responsible parties to protect the interests of the Organization. For the most serious violations, such measures may include the dismissal of the offending employees.

Information regarding actual or suspected violations must be submitted to Management in written, non-anonymous form, so that it can be analyzed in accordance with applicable law.

Reporting of corruption, breaches of the Code of Ethics, or other unethical behavior is encouraged, with guaranteed confidentiality.



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