



CODE OF BUSINESS ETHICS

Content

<u>I. General provisions</u>	2
<u>II. Basic principles and values of the company</u>	2
<u>1. Professionalism, legality and equality</u>	2
<u>2. Behavior that does not allow for corruption</u>	3
<u>3. Privacy and Competition</u>	3
<u>4. Occupational health & safety and environment</u>	4
<u>III. Communication and behavior norms</u>	4
<u>1. With clients</u>	4
<u>2. With contractual partners and suppliers</u>	4
<u>3. With public institutions, commercial and external communications</u>	4
<u>4. Internal company communication</u>	5
<u>4.1 Personal responsibilities and obligations</u>	5
<u>4.2 Management Commitment</u>	5
<u>IV. Internal acts and certificates</u>	6
<u>1. Integrated management system</u>	6
<u>2. Other main company documents that regulate the work performance of employees are:</u>	6
<u>V. Enforcement of the Code</u>	6
<u>1. Acceptance and Distribution</u>	6
<u>2. Violations</u>	7



I. General provisions

The management policy of "Kuminiano Fruit" Ltd. is aimed at: realized high quality of the activity, for full satisfaction of the customer's requirements with quality and safety of the manufactured products with safe and healthy working conditions and environmental protection.

The Code of Business Ethics aims to establish the norms that determine the behavior of all employees in the company during the performance of their official duties, their relationships with each other and with the owners of the company, as well as their relationships with employees from other companies – customers, partners and government authorities.

As members of the UN Global Compact, we are committed to applying the UN Guiding Principles on Business and Human Rights in conducting business.

In this sense, with this Code of Ethics, the Management of Kuminiano Fruit Ltd. aims to support the active policy in the following areas:

1. Ensuring priority of the quality and safety of the manufactured products.
2. Formation of a new way of thinking and taking adequate actions by each member of the company, which motivates everyone to maintain and increase the quality of the activities performed and their results in all units of the company, using the available resources effectively and efficiently material, human and financial resources, according to needs and requirements personally and collectively.
3. Strive for continuous improvement in the company's development.
4. Collecting and processing information from customers regarding the quality of the products and evaluating how close it is to their needs and expectations.
5. Continuous improvement of the qualification and motivation of the staff in order to increase the quality of work.
6. Compliance with the rules for occupational health and safety working conditions, sanitary hygiene, and environmental norms, according to national and international standards.
7. Effective management of occupational health and safety, minimizing the health and safety related risks of staff and other stakeholders, prevention of environmental pollution and employee illness or injury.
8. Periodic analysis of national and international regulatory documents and all other documents that the company has agreed to comply with, and which are related to the quality of the products offered, to the provision of healthy and safe working conditions and to the protection of the environment. Assessment of their impact on the company's activities, as well as continuous monitoring of the fulfillment of all obligations imposed by this type of document.

II. Basic 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, from which it follows that the pursuit of the company's goals cannot be contrary to the principles of honesty and correctness. Each employee is responsible for the performance of his duties. Compliance
-



with labor legislation, norms for health and safety at work, observance and observance of the laws regulating the company's activities, as well as the adopted internal rules, is explicit.

- All forms of benefits and gifts for employees are rejected in the context of an attempt to influence the independent judgment and strict performance of their official duties or with the aim of inciting actions contrary to the company's interests.
- The basis of the qualitative and reliable performance of the duties of the personnel in each field is the availability of the necessary qualification and improvement. Realizing this, the Management is committed to ensuring the development of human capital by conducting and participating in professional seminars and trainings.
- The merits and contribution of the employees are evaluated from the point of view of competence, qualification, workload, quality and timely performance of official duties, contribution to increasing the authority of the company, the profitability of its activity, compliance with the rules of this Code.
- All employees actively participate in the training plans provided by the company's management, aimed at their professional and qualification development, in order to increase and update their knowledge and skills.
- In relation to all internal and external company relationships, any type of discrimination based on age, racial and ethnic origin, nationality, political beliefs, religion, gender, sexual orientation, health status is avoided.
- Company policy prohibits the exploitation of child labor.

2. Behavior that does not allow for corruption

- A basic requirement at "Kuminiano Fruit" Ltd. is the obligation of all our employees, at all levels, to adhere to the principles of correctness and morality, the exact observance of the laws of the Republic of Bulgaria, both in their contacts with customers and partners, and with all institutions in the country in their personal service relationships.
- The employees of "Kuminiano Fruit" Ltd. do not create prerequisites for public officials to take advantage of their powers and official position for personal benefit or for any other beneficial purpose.
- The employees of "Kuminiano Fruit" Ltd. do not allow themselves or government officials with whom they have official contacts to be placed in financial or other dependence in relation to the company or third parties, which may affect the performance of their official duties or violate their professional approach to certain issues.
- "Kuminiano Fruit" Ltd. employees, who become aware of facts and circumstances of a conflict of interest, notify their respective direct supervisors.

3. Privacy and Competition

- The organization guarantees confidentiality in the use and storage of the provided personal information in accordance with the Personal Data Protection Act. Employees are prohibited from using the information for purposes that are not related to the performance of their official duties.
- Also of particular importance is the observance of complete confidentiality regarding the company and any information that poses a threat to the interests of the Organization, its competitiveness or damage to its reputation and. Employees are required not to export, share or publicize such information, as and any technical – costs and/or acquisition of assets, pricing, marketing strategies and others.



- Any confidential company information is managed through appropriate internal procedures that ensure that it will reach only interested people and entities and that its dissemination is only related to the objectives of the Organization.
- The organization is for fair and legal competition and expects from its employee's integrity and correctness in relations with partners and competitors.
- It is not allowed to use information acquired through unofficial means in the context of fair and loyal competition in sales and price communication.

4. Occupational health & safety and environment

- The organization is responsible for the health and well-being of all employees and ensures safe working conditions, respect for personal dignity. The laws regulating the activity conducted by the company, as well as the internal rules and norms adopted by the Organization, are observed.
- Environmental protection is a basic principle in the company's activity and a primary asset.
- The company's employees observe rules of behavior aimed at protecting the environment (including the equipment, machines and facilities they use), in order to fulfill the company's goals in this regard.
- For this purpose, all decisions and activities comply with the requirements for environmental protection, not only with the current legislation, but also with the latest trends in scientific research and the best practices in this field.

III. Communication and behavior norms

1. With clients

- The principles of correctness, professionalism and the highest degree of cooperation are the basis of all contractual relations and relations with the company's clients. Among the main responsibilities of the staff are research and ensuring customer satisfaction, as well as continuous improvement.

2. With contractual partners and suppliers

- Cooperation with contractual partners is an integral part of the company's activity. For this reason, the principles of impartiality and mutual respect when contacting them, giving clear instructions regarding the assigned tasks and paying the due sums described in the contracts are of particular importance.
- The contracts concluded by the company include clauses for 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 on the partners' compliance with the ethical norms set forth in this code.
- Not to create prerequisites for money laundering.

3. With public institutions, commercial and external communications

- All relations between the Organization and public institutions are based on the principles of fairness, transparency, cooperation and non-interference, as well as on full respect for the role



played by each individual entity. Any behavior that could be interpreted as insidious or to the detriment of the above principles is considered unacceptable.

- The company does not support any events or initiatives that have a wholly or predominantly political purpose.
- Supporting the society in which the Organization carries out its activities is its moral obligation and an expression of social empathy. In this regard, the Organization supports local educational and children's institutions and sponsors cultural mass events of the Municipality.

4. Internal company communication

4.1 Personal responsibilities and obligations

- The personal behavior of each employee is a key factor for the successful development of the Organization and the achievement of the set goals.
- Workers/Employees must avoid any action that would damage the prestige and reputation of the Company.
- In their relations, employees must obey the interests of the company, applying the established rules for a positive attitude, respecting the honor and dignity of the other.
- In communicating with each other, employees are equal. The relationship between them is based on trust, tolerance, ethics and mutual assistance. Personal disagreements are not subject to public controversy. Disputes, criticisms and disagreements are resolved with civilized methods in open communication.
- Personal hints and unfriendly behavior are considered unworthy. It is unethical and unacceptable to file groundless complaints and make defamatory statements about company employees. Any public statements must be objective and truthful.
- Behavior that harms the personal dignity and honor of each employee is not allowed.
- In the performance of official duties, the hierarchy must be respected, and one must strive for objectivity and impartiality, take responsibility for actions and actively participate in solving the Organization's problems.
- For all employees whose work requires the presence of a work uniform, the company provides one.
- Communication and exchange of information in the Organization are built based on the order of each process, the responsibilities and powers corresponding to the functional and hierarchical levels, as well as through the regulated work procedures. Internal communication is oral and written by e-mail.

4.2 Personal responsibilities and obligations

- The management is committed to apply to the highest degree the current shared company values in the conditions of transparency, dialogue and free exchange of opinions, ideas and proposals, in accordance with the requirements for a good worker, specialist and manager.
- Responsible for compliance with legal and other regulatory requirements relating to the company's activities, providing information on upcoming amendments and additions to current national and international regulatory documents, standards, directives, etc. and inform officials of such amendments.
- The observance of all human rights and freedoms of the individual is guaranteed, and all forms of irresponsibility, duplicity, envy, gossip, lies, meanness and carelessness are not tolerated in any way. The management categorically opposes any abuse of power or any other action aimed at harming the dignity of the person and his mental and physical health;



- The organization undertakes all necessary actions to ensure the highest standards of quality, safety and health at work, environmental protection, human capital development and transparent cooperation with all interested parties inside and outside the company.
- Each staff member must be employed on a contract of employment. No form of exploitation should be tolerated. The professional qualities of job applicants should be evaluated solely based on the pursuit of the company's interests. Any form of discrimination in the selection, management or career development of employees is rejected. All the time while working in the company, employees must receive clear instructions that support their work and allow them to do it well.
- In order to guarantee the high level of professionalism, the Organization must increase the qualifications of its employees, providing them with the opportunity to participate in training courses and professional seminars, and also organizes the holding of such.
- In case of reorganization, the value of each employee is protected, and if necessary, training and professional retraining measures are taken.
- Meetings, operatives, instructional meetings and others are necessary elements for effective internal company communication, which is essential for the Management.

IV. Internal acts and certificates

1. Integrated management system

- In order to prove the organization's ability to provide its customers with products and services that meet their requirements, an Integrated Management System was developed and implemented in the Organization, in accordance with the requirements of international standards ISO 9001, ISO 14001, ISO 45001, FSSC 22000, IFS. The documentation of the system has been conducted on three levels: Management Manual, Work Procedures and Good Manufacturing Practices (GMP).
- The manager delegates rights to achieve the goals of the management staff. He expects and will require from all employees a personal contribution to the achievement of these goals, thereby continuously improving the efficiency of the Integrated Management System. Each employee is responsible for the performance of his duties. Upon noticing errors, omissions and deficiencies, he is obliged to remove them, if they are within his authority, or to immediately notify his direct manager to take appropriate measures.

2. Other main company documents that regulate the work performance of employees are:

- Internal labor rules.
- Internal rules for fair sales competition and price communication.

V. Enforcement of the Code

1. Acceptance and Distribution

The Code of Business Ethics was created and approved by the General Management of the Organization, as should be all future amendments to it. Every member of staff and newly appointed employee should be introduced to the Code.



Complaints from employees regarding non-compliance with the code of ethics are submitted to the whistleblowing box. Confidentiality is guaranteed.

In order for a joint activity to be successful and effective, it is necessary to observe uniform rules of conduct and norms of interaction. They rest on the core values of the Organization and even if they seem like a self-evident truth, these are the actions the company expects from its employees and associates.

2. Violations

The norms of this Code are applied to the extent that they do not contradict the Labor Code and other applicable legislation.

In case of violation of the principles of the code of ethics, the Management must take disciplinary measures against the persons responsible for the violations, in order to protect the company's interests. In the case of the most serious violations, the measures in question may include the expulsion of the offenders from the company.

Information about actual and suspected violations must be submitted to Management in written and non-anonymous form in order to be analyzed, according to current legislation.

Reporting corruption and/or non-compliance with the code of ethics is guaranteed confidentiality.

Last Update 2024

Approved by:

General Manager: (Roberto Santorelli)