

# CODE OF ETHICS 2024-2025



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# INTRODUCTION

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## Introduction

### Global CEO's Letter

Sugal was founded in 1957 by my father and grandfather, who for several decades tried to build a solid and sustainable project based on the same principles, values, and conduct with which they raised their children and grandchildren.

Our vision embodies the belief that each day brings an opportunity to improve, to do more, and to do better.

Our conduct must be guided by norms, principles, and values that enable us to act ethically and responsibly.

The Code of Ethics is intended to serve as a reference for the principles, values, and mode of conduct for people within the Sugal Group.

Through a set of guidelines, it provides us with the framework to follow in our daily decisions, actions, and behaviors, materializing the highest ethical standards of conduct that we want to see reflected in our organization and in all the stakeholders with whom we engage in professional relationships: customers, suppliers, and other interested parties.

Using our code, we are confident that our path will be longer, more sustainable, and we are proud to offer a better company to future generations.

João Ortigão Costa  
Sugal Group

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## Introduction

Sugal is a food company that, throughout its history, has based its actions on adhering to and upholding ethical principles of integrity, respect for current laws and regulations, and producing with quality and responsibility.

To safeguard and protect our actions as a company, we have established reference documents that support our work. This Code of Ethics has emerged to complement and work alongside our Internal Regulations on Order, Hygiene, and Safety.

Sugal has three main pillars that sustain the spirit of work: corporate principles, company values, and ethical principles that govern the behavior of all employees without distinction and guide ethically responsible and sustainable actions.

### **Every Sugal employee has the duty to:**

- Know and respect Sugal's principles and values.
- Report any violation of the principles and rules promoted by the Code of Ethics.
- Collaborate in the implementation of procedures that may be carried out due to any violation of this code.
- Accept the sanctions established by the ethics committee.

### **Sugal's Corporate Principles:**

- Promote teamwork, knowledge exchange, and personal development.
- Promote work with responsibility, integrity, transparency, and intellectual honesty.
- Be proud of the company, its products, and the services we offer.
- Add value to our customers by always giving our best.
- Be impartial.
- Ensure compliance with current legislation and internal norms, principles, and procedures.
- Lead by example and contribute to being "+Sugal."

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## 10 Principles of the United Nations Global Compact (UN)

The UN Global Compact asks companies to adopt, support, and enact, within their sphere of influence, a set of core values in the areas of human rights, labor standards, environment, and anti-corruption.

### Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. make sure that they are not complicit in human rights abuses.

### Labor Standards

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Support the elimination of all forms of forced and compulsory labor.
5. Support the effective abolition of child labor.
6. Eliminate discrimination in respect of employment and occupation.

### Environment

7. Businesses should support a precautionary approach to environmental challenges.
8. Undertake initiatives to promote greater environmental responsibility.
9. Encourage the development and diffusion of environmentally friendly technologies.

### Anti-corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.



# MISSION, VISION, AND VALUES



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## Mission, Vision, and Values Sugal

### Mission

To transform tomatoes in a **safe, sustainable, and efficient manner**, offering **high-quality** food products.

### Vision

To be the global benchmark in **efficiency and quality** in tomato processing.

### Values

Corporate values are a set of beliefs and principles that a company considers relevant to achieving its objectives. These values translate into expected behaviors that define a particular way of doing things, contributing to the formation of a unique organizational culture.

The corporate values are part of Sugal's strategy and are considered fundamental pillars to achieve the company's mission and vision.



### **PASSION FOR QUALITY**

We recognize that the highest standards of quality can consistently be delivered in our people, processes, products, and services.



### **EXCELLENCE**

We focus on being the best every day and challenge ourselves to go further. We look beyond our “window,” analyze new perspectives, define and implement new strategies, and continuously innovate.



### **COMMITMENT**

We fully embrace our mission and act with a sense of belonging to achieve the common good.



### **INTEGRITY**

We act with transparency, fairness, and honesty in all our actions.



### **BE A TEAM**

We are a team when we align and combine our efforts, working collaboratively across departments for the success of the company.

# SCOPE AND RESPONSIBILITIES



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## Scope And Responsibilities

### Scope

The recipients of this Code include all executives and employees of **Sugal Chile**. This **Code of Ethics** outlines the basic obligations each of us has with Sugal Chile. It is not intended to cover every possible situation nor serve as a compendium of all the laws and regulations that apply to Sugal Chile. Therefore, under no circumstances should this Code be considered a replacement or override of other internal policies or procedures; instead, it complements them.

### Responsibility

We must always use common sense and good judgment when dealing with issues related to business conduct and seek guidance if we are unsure how to proceed in a particular case. It is the responsibility of all individuals subject to this Code to know, observe, comply with, and ensure full adherence to its provisions.

### Exceptions

The provisions of this Code of Ethics must be observed without exceptions. However, Sugal Chile may establish stricter conduct requirements for its staff when deemed necessary under particular circumstances, and these will always be communicated through formal channels.

# RELATIONSHIP WITH OUR CUSTOMERS, FARMERS, AND SUPPLIERS



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## **Relationship with our Customers, Farmers, And Suppliers**

Our Customers, Farmers, Suppliers, and Contractors must be treated fairly, equitably, and with kindness, creating a relationship with Sugal free from arbitrary discrimination. This ensures the highest level of trust, contributing to the company's development objectives.

### **Excellence and Transparency**

As part of our company's objectives, we aim for excellence in service to our customers and in the attention we provide to our Farmers and Suppliers. We anticipate, listen to, and respond to their needs in a timely and efficient manner. Decisions regarding purchases, rentals, or services for Sugal are based on factors such as price, cost, deadline compliance, and service quality. The procedures for these decisions must be transparent, pre-established, and communicated in a timely manner.

### **Equal Opportunities**

Decisions related to Customers, Farmers, and Suppliers cannot be influenced by unilateral benefits or agreements. Relationships with all parties are based on mutual respect, objectivity, and honesty.

All agreements or transactions must be governed by valid contracts and active legal frameworks.

Sugal employees are prohibited from receiving any form of benefit from negotiations or dealings, such as gifts, invitations, loans, or services of any kind.

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## Conflict of Interest

To trust with our Customers, Farmers, and Suppliers is essential, and conflicts of interest can harm our reputation and credibility as a company.

A conflict of interest arises when a Sugal employee who is involved in critical activities or decision-making has a personal or business relationship with a supplier or service provider.

It is for this reason that Sugal workers have the duty to report any situation that is, appears or could generate a conflict of interest.

Employees must report any situation that may appear to create a conflict of interest to their Direct Supervisor or Area Manager to preserve excellence, transparency, and equal opportunities.

# RELATIONSHIP WITH OUR EMPLOYEES





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## RELATIONSHIP WITH OUR EMPLOYEES

Our employees are the fundamental pillar of our company. Their daily dedication, commitment, and responsibility allow Sugal to be a company in constant growth.

### Respect for People and Diversity

Sugal promotes, values, and practices mutual respect, fair treatment, and kindness towards all employees, regardless of contract type, area, or position.

We do not tolerate any form of workplace or sexual harassment, violence, threats, or retaliation. Any inappropriate behavior must be reported immediately to the direct supervisor, management, or the ethics hotline indicated in this code, where confidentiality of information is guaranteed at all times.

Sugal recognizes that diversity in gender, race, ethnicity, language, place of origin, nationality, politics, religion, age, social status, sexual orientation, disability, marital status, or any other aspect enriches the workplace environment and fosters new perspectives, conversations, and ways of working. These factors must never be part of decision-making processes or impact daily work

These principles also apply to recruitment and selection practices, as well as the definition of employment terms, tasks, training, remuneration, benefits, promotion, discipline, and treatment of both employees and external stakeholders such as Customers, Farmers, or Suppliers.

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## **Labor Rights**

All Sugal employees are responsible for the role they perform and have the inalienable right to receive compensation for their work. Sugal recognizes the right of workers to freely associate in accordance with current legislation and to fulfill the responsibilities of their role.

## **Protection of Personal Information**

Sugal ensures and protects the confidentiality of all employees' personal and employment-related information, both during the employment relationship and after its termination, regardless of the reason for the contract's end.

# PROTECTION OF RESOURCES AND SUSTAINABILITY



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## Protection of Resources and Sustainability

All Sugal employees are responsible for the proper use of the company's resources and assets. We are committed to protecting and caring for our tangible and intangible resources, the environment, and the community, ensuring that our work is efficient and contributes positively to the regions in which we operate.

### Fraud, Theft, and Robbery

At Sugal, we are against any practices related to fraud, theft or robbery. These are defined as follows:

- Fraud: Deception or abuse of trust, intentionally omitting information that causes harm to the company.
- Theft: Taking possession of goods through force or violence, regardless of the value of the item.
- Robbery: Appropriating goods that do not belong to you without the use of violence.

All employees are required to report, in a timely manner and through the defined channels, any conduct involving fraud, theft, or robbery that could jeopardize the company's reputation.

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## **Use of Assets**

Sugal employees must protect and properly use the company's assets. These assets are provided for the benefit of work and the correct execution of each employee's tasks.

The use of assets must be mindful, without abusing available resources, and any deviation must be reported. Employees are responsible for the assets entrusted to them and must protect them properly.

## **Relationship with Public Bodies and Individuals**

Sugal is committed to maintaining transparent relationships with any public or state bodies. Employees or departments that interact with public bodies or individuals in their daily activities cannot accept any form of gratuity or gift that suggests an additional advantage.

We are committed to honesty and transparency to avoid situations related to bribery, which occurs when a public employee is offered or given benefits or advantages to perform actions in their job for personal gain.

Requests for information from any public body or authority must be made in writing, and the employee must obtain authorization from their Direct Supervisor or Management before providing it.

Sugal does not take a position regarding the participation of its collaborators in political activities outside of working hours; however, they may not do so on behalf of Sugal or use any type of company identification in these activities.

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## Sustainability

Our commitment to our team and the society around us is to “Be More.”

At Sugal, we are dedicated to strengthening initiatives and commitments in social responsibility and sustainability with respect to the environment and the communities we serve. We aim to improve our impact on the environment and foster strong relationships with our stakeholders, understanding that effective engagement creates mutual benefits of support and well-being.

Our commitment is:

- To provide our customers with the best products, produced to the highest standards of quality and food safety, promoting best practices from the field to the final product.
- To build and promote a culture of environmental respect, in line with legal regulations, focusing our efforts on reducing environmental impact through the reduction of consumption, preservation of resources, and proper waste management.
- To actively promote and engage in the development of the communities we are part of, listening, supporting, and acting for their sustainable growth and development.
- To facilitate and sponsor actions and projects that contribute to sustainability and human development.

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## **Agricultural Burning and Hunting Prohibition**

As part of our environmental commitment, the use of agricultural burning on company premises is strictly prohibited, meaning the practice of open fires for heating food or reducing plant waste is not allowed.

Additionally, hunting of any species within Sugal facilities is prohibited. The wildlife in our facilities is protected, and all employees are responsible for safeguarding it and reporting any action that threatens protected species.

An aerial photograph of a dense forest with a winding path. The path is a light brown color, contrasting with the dark green and brown tones of the surrounding trees. The path starts from the bottom left and curves towards the top right. The text "INFORMATION AND COMMUNICATION" is overlaid in white, bold, sans-serif font in the upper left quadrant of the image.

**INFORMATION  
AND  
COMMUNICATION**



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## **Information and Communication**

The management and handling of company information must be responsible, secure, and within the established guidelines. Internal and external communications should follow principles of respect, transparency, and adherence to the procedures set forth by the company.

### **Confidentiality**

Employees must maintain strict confidentiality regarding Sugal's information. All information handled by employees due to their position, whether related to suppliers, customers, production processes, transactions, sales, costs, etc., must be treated as confidential. The disclosure or misuse of confidential company information, by any means (oral or written), will be considered a breach of this Code.

Upon leaving the company, employees are obligated to return all confidential information and must not disclose any strategic, commercial, or financial information that could harm Sugal's reputation.

### **Privileged Information**

Privileged information is defined as any internal business information that is not shared with the market or external individuals.

Sugal employees are committed to maintaining the confidentiality of privileged information. They may not share internal information with external individuals who could use it for personal gain.

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## **Internal and External Communication**

Sugal is committed to transparency and open communication. Any external communication, such as with organizations or individuals outside of Sugal, must be conducted according to established standards and with prior approval from the relevant management, ensuring clear messaging that aligns with the company's strategy and principles.

In terms of communication with the media (newspapers, magazines, television, etc.), only the Board of Directors is authorized to provide statements or information. The Board may delegate this responsibility to others as necessary.

Internal communication, that is, of Sugal's own information that can and should be disclosed internally either for knowledge, alignment or recognition, will be done through the authorized channels in accordance with the communications procedure, under standardized formats and channeled through Human Resources.

### **Ethical line**

Any violation or concern regarding Sugal Chile's compliance with its actions, by either employees or service providers, can be reported through the Ethical line on the website: <https://sugal.linea-etica.la>

### **Sanctions And Compliance**

Failure to comply with the provisions outlined in this Code will be investigated and/or sanctioned according to the internal regulations on order, hygiene and safety at Sugal Chile, as well as applicable laws in effect.



**ACKNOWLEDGMENT OF RECEIPT.  
Code of Ethics**

I, \_\_\_\_\_,  
hereby acknowledge receipt of a copy of the CODE OF ETHICS in accordance with applicable legal standards and commit to respecting its content.

RUT: \_\_\_\_\_

Employee's Signature: \_\_\_\_\_

On \_\_\_\_\_, \_\_\_\_\_ 20