



**Sugal Group
Guide of Principles
"GPS"**

Table of Contents

Chapter I - Introduction	4
Chapter II - Purpose and Scope	4
Chapter III - Guiding Principles.....	5
Chapter IV - Duration and Implementation	7

Letter from the CEO of the Sugal Group

The Sugal Group was founded in 1957 in Azambuja, Portugal, by my father and grandfather, who, over several decades, endeavoured to build a solid and sustainable project, driven by the same principles, values, and ethics with which they raised their children and grandchildren.

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

It is therefore essential that our conduct is based on principles and values that enable us to act in an ethically correct and responsible manner.

The "GPS" - Sugal Group Guide of Principles - is intended as a reference for the principles, values, and conduct guidelines that everyone within the Sugal Group should follow. Through a set of coordinates, our GPS serves as a guide for our daily decisions, actions and behaviours, embodying the highest standards of ethics and conduct that we want reflected in our organisation and in all our partners.

We are confident that using our GPS will contribute to a longer and more sustainable journey for the Sugal Group and we are proud of the legacy we have built and will leave for future generations.

João Ortigão Costa

A handwritten signature in blue ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name João Ortigão Costa.

Chapter I

Introduction

Throughout its history, the Sugal Group has based its conduct on the highest principles of ethics, integrity and respect for the laws and regulations in force, prioritising quality, awareness and sustainable production.

In order to safeguard and protect our actions as the Sugal Group, a set of internal guidelines has been created that must be respected by all, including this GPS – Sugal Group Guide of Principles (hereinafter referred to as the “Guide” or “GPS”), which complements and works alongside the other internal policies of Sugal Group and/or its companies in the various countries where Sugal Group is present (currently, Chile, Spain and Portugal).

Our **GPS - Sugal Group Guide of Principles**, provides direction in our daily decisions and actions through a set of guiding coordinates. It is built on three pillars: The Sugal Treaty, Values and Rules of Conduct and is governed by the Guiding Principles.

These coordinates reflect our purpose as the Sugal Group, the principles that we promote internally and that should be followed by each and every one of us.

Chapter II

Purpose and Scope

2.1 Purpose

The Sugal Group Guide of Principles should function as a true GPS, i.e. as a guiding element for the conduct and ethical standards that must be observed by all, and aims to be an institutional reference that contributes to the Sugal Group being recognised as an example of excellence, integrity, responsibility and rigour.

2.2 Scope

This GPS applies to all Employees of Sugal Group companies regardless of their contractual relationship and seniority, encompassing all individuals who perform activities within Sugal Group, including workers, members of governing bodies, interns, or volunteers, as well as all individuals who act on behalf of or represent the Sugal Group (referred to in this GPS simply as “Employees”).

The principles set out in this GPS should also be communicated and recommended to the other

service providers, contractors, business partners and suppliers of the Sugal Group, within the framework of the relations established with them, who should be invited to read and adhere to it.

The provisions of this GPS do not exempt the application of other internal policies of the Sugal Group and/or the companies that comprise it, nor do they exempt any applicable legal or regulatory regimes for all Sugal Group Employees in the performance of their professional duties. In the event of conflict, the most stringent regime should be followed.

Chapter III **Guiding Principles**

With the aim of being better and achieving more, we have agreed that the following principles, values and rules of conduct are absolutely non-negotiable for us and we are committed to respecting them at all times, both within the Sugal Group, in our internal relations and in our external relations with customers, producers, suppliers, service providers and other related parties:

3.1 Principles of the UN Global Compact

The Sugal Group fully subscribes to the 10 Principles of the United Nations Global Compact. As such, Sugal Group companies and Employees must:

Human Rights

1. Support and respect the protection of internationally recognised human rights;
2. Ensure that they are not complicit in human rights violations;

Labour Practices

3. Support freedom of association and the effective recognition of the right to collective bargaining;
4. Ensure that there is no forced labour;
5. Ensure that there is no child labour;
6. Ensure that there is no discrimination in employment;

Environment

7. Take a preventive approach to environmental challenges;
8. Develop initiatives to promote greater environmental responsibility;
9. Encourage the development and diffusion of environmentally friendly technologies;

Combating corruption

10. Combat corruption in all its forms.

3.2 Sugal Treaty

It is essential that we all ensure that in our daily lives:

- We are passionate about what we do
- We always recognise that we can do better
- We are always loyal
- We respect all people
- We are competitive
- We do what needs to be done
- We have resilience
- We are an example
- We work effectively
- We are a team

3.3 Values that drive us

It is essential that we always bear in mind the following values:

- Passion for Quality
- Excellence
- Commitment
- Integrity
- Being a Team

3.4 Rules of Conduct

The teams that make up the Sugal Group companies produce food products that will be consumed by people. This is our raison d'être - producing with and for the people! It is therefore fundamental to promote compliance with good production practices, product quality and food safety, ensuring products that are both healthy and safe. It is also essential to promote compliance with health and safety rules at work so as not to endanger the safety of ourselves and those of others.

On the other hand, respect for the dignity, integrity and professionalism of our people and for others is, in fact, the first and foremost rule from which all others derive. The actions, decisions and behaviours of each Employee of the Sugal Group companies must contribute to achieving their

purpose as a whole and each Employee must be aware that the Sugal Group is built on the sum of the personal and professional conduct of its teams.

It is therefore essential to ensure compliance with and respect for the rules of conduct defined by the Sugal Group in its Internal Policies, in particular in the Code of Conduct for each of the companies in the various countries in which the Sugal Group has a presence.

Chapter IV

Duration and Implementation

4.1 General Provisions

The GPS will be publicly available both internally and externally within 10 days of its implementation and any subsequent revisions. It will be accessible for all recipients on the Sugal Group's digital platforms (internet and intranet) and in printed form at the Human Resources offices.

The GPS has immediate effects, and for current Employees of the Sugal Group companies, their adherence to this GPS is presumed unless they express opposition in writing within 21 (twenty-one) days from the date of its disclosure.

The principles set out in the GPS should also be communicated and recommended to the other service providers, contractors, business partners and suppliers of the Sugal Group, within the framework of the relations established with them, who should be invited to read and adhere to it.

The implementation of this GPS is overseen by the Compliance Officer, in accordance with the law and relevant provisions, who may be contacted at compliance@sugal-group.com.

4.2 Training

The Sugal Group will provide regular training to all its Employees on the issues addressed in this GPS.

4.3 Clarifications

Requests for clarification regarding the interpretation or application of this GPS should be addressed to the Compliance Officer, who will respond or refer them to the appropriate department for resolution.

4.4 Non-compliance

Compliance with the rules, principles and values set out in this GPS is binding on all Employees of each of the companies in the various countries where the Sugal Group operates.

Failure to comply with this GPS will result in disciplinary measures (including termination of the contractual relationship) and criminal, administrative or civil liability, which may result in the imposition of penalties, fines, damages, as well as the application of ancillary sanctions.

4.5 Reporting of Infringements or Breaches

Any suspected infringements or breaches of this Guide should be reported through the Sugal Group's Whistleblower Channel (available on the internet and intranet), in accordance with the Whistleblower Channel Terms and Conditions.

4.6 Revisions

The Sugal Group reserves the right to update this GPS periodically. Whenever changes are made, they shall be communicated in due time to all employees and other related parties as appropriate.