

APOT SUPPLIER CODE OF CONDUCT

I – SCOPE AND OBJECTIVES

Associazione Produttori Ortofrutticoli Trentini (“Apot”) is committed to upholding the highest standards of integrity, transparency and accountability in all its business activities. Apot is aware that these standards constitute value and a condition for success and therefore considers their timely application a necessary requirement for the daily conduct of its business.

We expect that you, as suppliers to Apot, share this commitment and comply with this code of conduct (the “Code of Conduct”).

This Supplier Code of Conduct is prepared to support our commitment to act ethically and responsibly in our business and workplace, as described below. The requirements and expectations defined in this Code of Conduct apply to and are binding on all Apot suppliers, regardless of their location or place of business.

Apot requires all of its suppliers to comply with this Code of Conduct. In particular, Apot expects all of its suppliers to:

- respect the human rights of all individuals, including the right to fair treatment;
- ensure the absence of any form of harassment, bullying and discrimination;
- promote safe and healthy working conditions;
- protect the environment and minimize the impact of their activities on natural resources and ecosystems;
- act with integrity and honesty in all business dealings, countering illegal practices and all forms of possible bribery and corruption;
- comply with all applicable laws, regulations and industry standards;
- implement mechanisms to identify and manage risks related to the above issues; and
- provide, upon Apot’s reasonable request, adequate documentation demonstrating implementation of the principles outlined in this Code of Conduct.

Apot takes the issues outlined in this Code of Conduct very seriously and will not tolerate any violations of it. In the event of violations, Apot may take such action as it deems appropriate, including termination of the business relationship with the supplier. In addition, we expect our suppliers to cooperate fully with any investigation of potential violations and take corrective action as necessary.

II – SOCIAL PRACTICES AND HUMAN RIGHTS

We expect all our suppliers to comply with all laws, regulations and industry standards, including Collective Bargaining Agreements, where applicable, regarding human rights and working conditions.

Forced labour

Our suppliers shall not use any form of forced or compulsory labour, including but not limited to bonded labour, slavery or practices similar to slavery, servitude, trafficking in human beings, labour exploitation or violence.

All workers shall be free to terminate their employment relationship and shall not be subjected to any form of physical or psychological coercion or intimidation, such as humiliation, mental abuse, threats or sexual harassment. Suppliers employees shall initiate their employment relationship on a voluntary basis and shall have the right to terminate it in accordance with all applicable laws.

Child labour

Child labor is defined as any work or activity that interferes with a child's schooling and/or is mentally, physically, socially, or morally dangerous and harmful to children.

Child labour is a serious problem and persists in many parts of the world. Apot is committed to combating the employment of under 18-year-olds in work that is hazardous, abusive, and/or interferes with their education and development, including, for example, work during night hours. We expect our suppliers to adhere to the highest ethical standards and



comply with all applicable laws and regulations regarding child labour.

Apot is also committed to promoting the rights of children and ensuring that they are protected from all forms of exploitation. Apot will work with its suppliers and other stakeholders so that practices that support the rights and welfare of children are promoted.

Illegal or clandestine work

Apot does not tolerate any form of illegal or clandestine work in its supply chain. Therefore, Apot suppliers shall in no way use or benefit from illegal labor and shall comply with all applicable regulations to prevent clandestine, undeclared or illegal labor. The only form of labor allowed is that which fully complies with applicable regulations on the employment of workers.

Discrimination, harassment and abuse

Suppliers shall ensure that all decisions regarding hiring, placement, compensation, advancement, training, and disciplinary sanctions comply with applicable state and local laws.

Apot suppliers are also committed to providing a work environment free of all forms of discrimination and to treating all employees with dignity, respect and fairness. No person shall be subjected to discrimination in employment practices, including but not limited to hiring, compensation, advancement, and termination, based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, ethnic origin, or membership in social groups. Any form of physical, sexual, psychological or verbal harassment or abuse is also prohibited. Suppliers must guarantee equal opportunities for all workers, ensuring that they are treated with respect and dignity, with no tolerance for abuse or threats of any kind.

Suppliers must commit to preventing the above and must promote diversity and inclusion in the workplace by encouraging the development of a resource environment that reflects the diversity of today's communities.

Associations and collective labour agreements

In compliance with applicable laws and regulations, the supplier recognizes the right of workers to freely

associate and bargain collectively. Apot suppliers must guarantee this and must not interfere with the formation of workers' organizations or the negotiation of collective labour agreements.

No worker or worker representative of Apot suppliers will be subject to dismissal, discrimination, harassment, intimidation or retaliation for exercising their legitimate right of association or collective bargaining.

Protection of workers' health and safety

Apot believes it is absolutely necessary to create and maintain a safe and healthy workplace for all workers. Apot provides adequate resources for the prevention of risks related to occupational safety and hygiene and for constant updating and training at the various levels of responsibility. Each function identified in the safety organizational chart must implement the tasks provided for in the internal procedures for monitoring the application of the established prevention rules, including in relation to customers and suppliers who should operate within the company's workplaces. All workers must comply with the established prevention and safety measures. Apot therefore requires its suppliers to act with full and constant compliance with current national and international rules and regulations on safety and health in the workplace and in particular that:

- ensure a healthy and safe working environment for all their workers, possibly by having a certified safety management system;
- strictly comply with all applicable health and safety laws and regulations;
- adopt adequate systems to identify and address potential health and safety hazards as well as to minimize the risk of injuries and accidents, including by scheduling periodic inspections;
- act promptly to address identified hazards.

In addition and in all cases, to minimize the risks of accidents, injuries and occupational diseases, suppliers will need to ensure that workers have the proper equipment (including personal protective equipment), schedule effective controls and establish safe work procedures, and implement programs and systems aimed at ensuring worker safety.

Working hours and vacations



Apot suppliers must comply with all applicable laws and regulations regarding working hours and vacations, including laws governing the maximum number of working hours, rest periods, breaks and holidays.

Apot also expects its suppliers to adopt appropriate policies to ensure that employees use vacation and personal days as needed, including the granting of paid time off or other forms of compensation.

Supplier must also pay employees overtime at the legal rate and meet all legal requirements for workers' benefits.

Employment contracts and remuneration

All employees (including temporary workers, trainees, and interns) of our suppliers must conclude written employment contracts that comply with applicable regulations and outline all terms and conditions of the employment relationship. All employees must receive notice of these contracts and pay cheques must be delivered to them within the terms specified in the employment agreement.

Apot suppliers must ensure that wages and related benefits, including overtime pay, meet or exceed the minimum standards established by applicable regulations. Employee wages must be at least equal to the minimum wage for equivalent work in the country and sufficient to provide employees and their families with a decent standard of living. Quantification of remuneration must be established on the basis of the individual employee's skills, experience, professional potential and performance. In addition, wage equity must be maintained for all employees on equal terms and merit.

Overtime hours must be adequately remunerated in compliance with applicable laws and regulations.

Training

Apot believes that a key aspect of enhancing the value of workers is to ensure that they are adequately trained. Therefore, its suppliers must provide regular training to employees to ensure adequate levels of competence and knowledge to perform the tasks assigned to them. Apot attaches primary and qualifying value to training and dedicates adequate resources and tools to achieve the defined objectives with particular attention to legal requirements; personnel must

participate in moments of involvement and training in a spirit of cooperation. Therefore, Apot expects suppliers to do all of the above.

III – SUSTAINABILITY AND ENVIRONMENTAL PROTECTION

Apot aims to reduce its environmental footprint and achieves this by its commitment to respect the environment throughout its supply chain, innovative working methods, implementation of responsible behavior, and continuous improvement of its management systems. Within this framework, Apot promotes respect for the environment and expects all of its suppliers to share Apot's environmental commitment by complying with the following standards.

Environmental impact monitoring

Suppliers must identify and manage the significant environmental impacts of their operations and implement improvement plans in order to reduce their environmental footprint as much as possible. Apot encourages suppliers to cooperate in calculating the environmental impact of the entire production chain in order to be able to minimize its negative effects.

Compliance with environmental regulations

Apot requires its suppliers to continuously comply with national and international environmental laws, regulations and standards, including those related to air and water quality, waste management, and hazardous materials handling and disposal. It also recommends having a certified environmental management system, where applicable.

Reduction of environmental pollution

Apot suppliers must, in addition to complying with legal requirements, prevent and reduce any form of environmental pollution, including air, water, soil and groundwater pollution, as well as promptly restore and remediate any environmental accidents that happen to them.

Suppliers must also minimize the environmental impact of their activities including by adopting responsible policies, using energy efficient technologies, reducing greenhouse gas emissions,



conserving natural resources, and possibly choosing recycled, recyclable or compostable materials in their business. The use of hazardous substances by suppliers shall comply with the requirements imposed by law. In particular, suppliers will be required to prohibit the use of substances that are prohibited or harmful to human health and/or the environment. In addition, suppliers will be required to implement appropriate measures for the safe handling, storage, and transportation of such substances.

Promotion and protection of resources

Apot expects its suppliers to adopt production processes aimed at reducing waste of natural resources, with a focus on water and energy conservation. Apot encourages a proactive approach to innovative solutions and technologies that continuously improve products and services, reducing their environmental impact.

IV – COMPLIANCE AND ETHICS

Apot is committed to operating by adopting the highest standards of integrity and accountability and to preventing all forms of public and private corruption. Apot also expects its suppliers to consistently uphold these values. Finally, it and its suppliers adhere to high ethical standards in all our business practices.

Bribery and corruption

Apot will not tolerate, and expects its suppliers not to tolerate, any form of bribery or corruption, whether active or passive, in any context, form, or manner, and in any jurisdiction. This includes not only illegal activities, but also practices that are accepted, tolerated, or not judicially prosecuted in certain contexts, but that could compromise Apot's commitment to integrity.

Apot suppliers must reject and prevent any form of bribery and must refrain from granting, offering, promising or accepting to or from business partners, public officials or other third parties (whether private or public) bribes, gifts, entertainment, facilitation payments, donations business opportunities, and any other benefits or advantages that (i) may constitute the extremes of a regulatory violation and/or (ii) are contrary to this Code of Conduct and/or (iii) may be perceived as aimed at obtaining an improper or

inappropriate business advantage or influence. These behaviors are considered inappropriate or improper (and therefore contrary to this Code of Conduct) when they create or are expected to generate a sense of obligation that may influence business decisions.

Suppliers must comply with laws on anti-corruption, anti-money laundering, self-money laundering and receiving of money, goods or other benefits found in all countries where they do business.

Suppliers are also required to check in advance the available information on their business partners, suppliers, partners, associates and consultants in order to ascertain their integrity and respectability in anti-money laundering and anti-corruption matters before establishing business relationships with them.

No benefits should be demanded and conflicts of interest that could lead to the risk of corruption should be avoided.

Finally, Apot suppliers must ensure that their directors, officers, employees, suppliers, affiliates, subcontractors, and representatives also comply with the rules outlined in this section and implement and maintain an effective compliance framework.

Other illegal acts

Apot does not tolerate any form of theft, fraud, forgery, swindling, embezzlement, fraudulent financial reporting, extortion, crimes of insolvency, illegal payments, and any other illegal acts by suppliers and their employees.

Suppliers must also avoid and not facilitate money laundering or the financing of criminal activities.

Therefore, suppliers should not engage in misconduct such as, but not limited to, (i) forging invoices or creating fraudulent reports or documentation; (ii) falsifying the nature of transactions; (iii) creating or submitting false statements; (iv) stealing assets; (v) misusing resources and/or products for personal purposes.

Suppliers must take actions in order to prevent the inadvertent use of company resources for such purposes and must monitor unusual or suspicious activities and transactions.



Unfair competition and antitrust

Apot suppliers must compete in the marketplace fairly and in compliance with all applicable antitrust and unfair competition laws and regulations.

Apot suppliers shall not alter or falsify the characteristics of Apot's products or services, act dishonestly, or engage in other unfair or anti-competitive practices.

Compliance with trade regulations

Ensuring responsible trade is fundamental to Apot. For this reason, Apot requires its suppliers to comply with all applicable trade laws and regulations, including those related to import and export controls, trade sanctions and customs procedures.

Imports and exports should be documented accurately by suppliers and measures should be implemented to reduce the risks associated with trade and export controls.

Apot recommends that its suppliers not cooperate with parties that directly or indirectly send goods or data to parties or countries where this is prohibited.

Compliance of products and services

If applicable, Apot suppliers must have adequate governance and compliance systems in place to ensure compliance with all applicable laws and regulations, as well as this Code of Conduct.

To enable full transparency, suppliers shall maintain accurate and complete records in accordance with all applicable laws and regulations, including those related to financial reporting, tax and anti-corruption.

Promotional and marketing activities

Any promotional materials and marketing activities of suppliers must comply with applicable national, European, international, local and regional laws and regulations, the principles of this Code of Conduct, Apot's directions and contractual clauses, and must always reflect positively on Apot's image.

Data protection

Apot suppliers are required to comply with all applicable data protection laws and regulations,

including the General Data Protection Regulation (GDPR) and all relevant national laws. In this regard, Apot expects its suppliers to:

- implement appropriate measures, including IT measures, to protect the confidentiality and security of personal data processed;
- collect, use or disclose personal data only for legitimate and lawful purposes and in accordance with the rights of data subjects;
- implement appropriate technical and organizational measures to protect personal data from unauthorized access, use, or disclosure; and
- inform Apot of any breach of the above obligation if it relates to personal data transmitted to the supplier by Apot and of any security-relevant event that could lead to such a breach.

Confidentiality

All information regarding Apot should be treated as strictly confidential. Suppliers must allow access to this information only to those directly involved. Unless authorized in writing by Apot, its suppliers shall not disclose this information to third parties and shall implement appropriate measures to properly manage the collection, storage, archiving, use, and sharing of this information as well as to prevent the misuse, falsification, forgery, theft, or unauthorized disclosure of this information of Apot. The latter relies on its suppliers to respect the confidentiality of this information of Apot and its business partners and to treat it with care.

Intellectual property

Apot recognizes a primary value to creativity and innovation and is committed to protecting intellectual property rights. Apot, therefore, also expects its suppliers to respect and protect the intellectual property and intellectual property rights of others.

Therefore, Apot's trademarks, industrial designs, copyrights, patents and any other intellectual property rights it shares with its suppliers shall be respected. Apot expects its suppliers to use such information only to fulfill their obligations to Apot and to take appropriate measures to protect such information from unauthorized use or disclosure.



It is also considered an infringement of Apot's intellectual property rights to remove, distort and/or modify its trademarks and/or technical data and/or labels delivered with products or otherwise supplied by Apot, without Apot's prior written consent.

In any case, suppliers shall not engage in conduct or practices (i) that could mislead or confuse customers as to the origin, provenance or quality of the products; or (ii) aimed at altering or counterfeiting trademarks and/or distinctive signs of Apot or others. In any case, suppliers must behave, in the performance of their activities, in a manner that reflects positively on Apot's reputation.

V – VIOLATIONS OF THE CODE OF CONDUCT

The values set forth in this Code of Conduct and compliance with its provisions are of utmost importance to Apot. For this reason, Apot requires all of its suppliers to strictly adhere to the provisions set forth in the Code of Conduct and to comply with the following monitoring rules.

Reports

Apot suppliers shall promptly report any violations of this Code of Conduct and/or relevant laws, including any violations committed by consultants, partners, employees, agents or other representatives acting on behalf of the supplier or Apot.

Reports of any alleged or confirmed violations should be sent to the e-mail address "melinda@melinda.it" or to the following address: Via Brennero, 322 - 38121 Trento (TN).

Apot ensures that all reports received will be treated confidentially, discreetly and without any form of retaliation. This is without prejudice to any reporting obligations that may arise as a result of the reports made, to the Judicial Authority or other competent authorities.

Audit

Apot reserves the right to verify that suppliers comply with the principles set forth in this Code of Conduct in order to promote transparency as well as to ensure compliance with the standards and provisions contained herein. Therefore, Apot or third parties specifically authorized by Apot may conduct audits

through inspections at any time during normal working hours. During such inspections, Apot may request access to the offices and premises where its suppliers operate, as well as examine available documentation. It may also conduct interviews with company directors, employees and other personnel at the supplier's workplaces. Any audit or inspection will relate solely to the business relationship between Apot and the supplier.

Apot expects all of its suppliers to provide full cooperation in carrying out the above control activities and to maintain all documentation necessary to verify compliance with this Code of Conduct, relevant laws and regulations.

Consequences of violation

Compliance with the standards outlined in this Code of Conduct is an ethical responsibility of Apot suppliers and is a key element in engaging and maintaining business relationships with Apot. Therefore, in the event of violations of this Code of Conduct Apot may: (i) require corrective measures to be taken; (ii) terminate or suspend the business relationship; and/or (iii) exercise any other right or claim under applicable law. In addition, it is the responsibility of each supplier to ensure that its personnel, at all levels, understand and comply with the principles of this Code of Conduct.

If you have any concerns or questions about the interpretation or application of our Code of Conduct, please do not hesitate to contact the Apot personnel who manage your business relationship with us.

