

De Prado

GENERAL POLICY ON SUSTAINABILITY

Introduction

The Sustainability Committee at De Prado Total Agricultura, LDA and the subsidiaries in its Group (hereinafter, “**De Prado**” or “**the Group**”) is tasked with assessing and reviewing the sustainable development strategy, in other words, ethics, sustainability and governance within the Group. Specifically, it is responsible for reviewing the corporate policies containing the guidelines that govern the Group's performance.

The policies and standards comprising the **De Prado Group Compliance System** aim to establish the procedures and controls with the dual purpose of complying with the **Sustainable Development Goals** (“**SDGs**”) approved by the United Nations (“**UN**”) and the laws and regulations that apply to the Group's operations.

De Prado’s sustainability strategy is posited on three core pillars: **(i)** environmental aspects, **(ii)** social aspects and **(iii)** corporate governance and compliance aspects

To express the Group's firm commitment to the sustainable development strategy, the De Prado governing body is responsible for approving this General Policy on Sustainability (the “**Policy**”).

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1. Definitions

De Prado	De Prado Total Agricultura, L.D.A., its subsidiaries and affiliates
CCO	Chief Compliance Officer
CMD	Corporate Managing Director
GOOD	General Operations and Olive Director
Policy	The General Policy on Sustainability
Professionals	Individuals who provide services to De Prado (employees, self-employed workers, officers, subcontracted workers, suppliers and more)
Third Parties	Individuals other than employees who De Prado has business relationships with (suppliers, customers, advisors, consultants, managers and more)

2. Purpose

The purpose of this Policy is to set out the **general principles and specific objectives** governing the Group's sustainable development strategy, with the aim of ensuring that the activities De Prado engages in contribute to achieving the SDGs.

De Prado is distinguished in the industry as a business group deeply committed to sustainability and to valuing the impact of its operations on the Group's different stakeholders as a key aspect of its strategy. The Group seeks both excellence in sustainability and an efficient and neutral return on all its activities and products, and develops its business around a model of a circular and sustainable economy.

De Prado generates sustainable value by engaging in activities that take its stakeholders into consideration. It does so by considering the three cornerstones of its strategy: (i) environmental, (ii) social and (iii) corporate governance and compliance.

3. Scope of Application

This Policy applies to all the companies in the Group and investee companies where De Prado holds a controlling share. It also applies to our joint ventures and partnerships where De Prado takes on their management.

Implementation of the De Prado sustainability strategy is crosscutting in nature, in other words, it is the responsibility of all corporate areas, employees and directors to onboard

it into their daily professional activities and across their challenges, businesses and commercial objectives.

4. De Prado General Sustainability Principles

1. To support the United Nations 2030 Agenda and the Sustainable Development Goals (SDGs), as well as the Global Compact principles on human rights, labour standards, environment and anticorruption.
2. To establish policies and procedures that promote and ensure respect for human rights, environmental protection, health and safety, climate change, resource efficiency, diversity, equal opportunities, fiscal responsibility, prevention of unlawful conduct and anticorruption. The Group defines internal checks to achieve this.
3. To promote a culture of ethical behaviour towards people and environment, ensuring equal opportunities, nondiscrimination and human rights under the motto of **ZERO TOLERANCE** for corruption.
4. To ensure its operations consider all aspects of sustainability, providing the resources required and considering the concerns and needs of the Group's different stakeholders. To foster the search for sustainable businesses that contribute to and enrich the De Prado value chain and therefore the Group's companies.
5. To reduce and prevent greenhouse gas emissions, helping mitigate the effects of climate change. To achieve climate neutrality going forwards.
6. To prevent damage and risks to people, society and environment.
7. To set out economic, environmental and social-performance indicators directly related to the information published in the Group's Non-Financial Reporting statement, promoting transparency across all areas of activity.
8. To monitor strict compliance with the legal requirements in force and check that our professionals and third parties do, too.
9. We are committed to conserving and enriching biodiversity in our operations, respecting natural ecosystems and applying the circular economy, minimising waste and optimising resources. This approach, together with the use of renewable energies and sustainable innovations, shores up our leadership in the sustainable development of the agriculture industry.
10. Promoting Community Development and Local Engagement: we are committed to actively contributing to the socioeconomic development of the local communities where we operate, fostering community inclusion and empowerment. This includes supporting local education, health,

infrastructure and economic-development initiatives, and working with communities to understand and address their needs and aspirations. We strive to build relationships of collaboration and mutual respect, ensuring that our presence delivers sustainable value and progress to these communities.

5. De Prado Sustainability Action Principles

The Group has adopted the following **Specific Action Objectives** to deliver on the general principles set forth above:

5.1. Freedom and Dignity: There is no excuse for discrimination or harassment

- ▶ De Prado advocates for and ensures there is NO form of discrimination on the job and opposes any form of harassment or bullying in the workplace. We do not allow any kind of abuse of authority or offensive conduct that might undermine our professionals' personal freedom. For that reason, we have created a mandatory Harassment Prevention and Action Policy which establishes the appropriate preventive mechanisms to preclude these situations.

5.2. Environment

- ▶ We encourage environmental responsibility and environmentally friendly practices and invest in R&D aimed at ecosystem sustainability.
- ▶ We adopt environmentally friendly measures in crop cultivation, waste management and renewable energy. The Sustainability Department promotes all manner of sustainable measures to tap resources without damaging the environment around us, including water conservation and the sustainable management of water resources, the creation of green corridors and the protection of pollinators to foster biodiversity.
- ▶ We commit continuously to innovation, improving our processes every day to offer our customers products of the utmost quality and in the most sustainable way possible. **We strive every day to achieve the objectives shown below:**
 - a. Improve process performance and waste reduction.
 - b. Promote the circular economy, recovering industrial and agricultural by-products for reuse in the fields, for energy or as animal feed.
 - c. Optimise agricultural inputs, including the use and promotion of organic and natural fertilisers.
 - d. Control and optimise irrigation and fertilisation in olive and almond crops.
 - e. Decarbonise processes and improve energy efficiency.

- ▶ Develop environmental education and awareness initiatives for employees and the local community, reinforcing understanding and participation in sustainable practices.
- ▶ Establish collaborations and partnerships with other companies, NGOs and government organisations for environmental sustainability projects, seeking to broaden the scope and impact of sustainable actions beyond the company's own operations.

5.3. The Fight Against Corruption

- ▶ We actively engage in the fight against corruption in all its forms, including extortion and bribery, and have made **ZERO TOLERANCE** our action principle. An Anticorruption Policy mandatory for all the professionals who engage with De Prado has been developed for this purpose. Evaluation questionnaires have been put together to ensure strict compliance by any professional or third party who works with De Prado as a representative, supplier or subcontractor to ensure that they undertake to fight corruption on at least the same terms as our Group. Additionally, in certain cases indicated in the Policy, a questionnaire must be completed to assess the third party or supplier's compliance and ensure there is no possible case or history of corruption.
- ▶ We have also implemented procedures and policies to prevent conflicts of interest.

5.4. Promotion of Equality and Fair Working Conditions

- ▶ De Prado opposes and condemns any type of forced labour, slavery, child abuse, exploitation or situation that undermines human rights. Entry into the labour market strictly complies with the laws in force. We have zero tolerance for child labour. All our professionals and third parties must not only comply with but also report any case of modern slavery that entails the obligation to work under coercion, threat or abuse of power, among others. To that end the Group has implemented a supplier approval process so that all third parties agree to, know and comply with the Code of Ethics before starting any business relationship with De Prado, as stated in more detail below.

5.5. Safety at Work

- ▶ De Prado guarantees a safe working environment where the proper health and risk-prevention conditions are met, in line with the international standards laid down by the International Labour Organization. The Prevention Department runs training courses to raise awareness around the risks inherent in our

professionals' exercise of duty. All our professionals must meet the De Prado Safety at Work procedures.

- ▶ They are also required to know and comply with the Group's H&S procedures and in the event of a risky or unsafe situation must stop what they are doing and report it to their line manager so the appropriate measures can be taken.

5.6. Compliance System

- ▶ De Prado has designed a Compliance System to prevent, detect and mitigate the risks of legal or regulatory noncompliance. We double down on ensuring the system is efficient and allows for effective control by implementing different processes and procedures across all areas and in all the activities the Group performs. De Prado has also rolled out a Risk Map it keeps up to date. The map was prepared following an analysis of the activities the company engages in and the potential legal risks of its activity.

5.7. Whistleblower Channel

- ▶ De Prado considers it essential that any breach be brought to the Group's attention. To that end we have implemented a Whistleblower Channel in accordance with the laws in force, which we leverage to ensure no retaliation is taken against people who report an infringement in good faith. As shown in our Whistleblower Policy, we guarantee that good-faith whistleblowers will not be subject to any reprisals and guarantee their anonymity, among other rights.

5.8. Transparency

- ▶ Transparency is a hallmark of De Prado and one of the core objectives of the communication strategy we consider essential to build trust and credibility. De Prado is firmly committed to circulating accurate and up-to-date information so that stakeholders are fully aware of the business and of the achievement of strategic milestones and key information impacting the Group.

5.9. Innovation and Technology

- ▶ De Prado considers innovation the number-one tool for ensuring sustainability, efficiency and competitiveness. It is a key strategic factor that impinges on all the Group's businesses and the activities it performs. The different company areas work to achieve efficiency and to reduce economic and environmental costs.

5.10. Free Competition

- ▶ De Prado firmly believes that to achieve economic growth we must comply with antitrust laws and regulations, as well as ones that allow competitors to grow and compete fairly in the market. A **Competition Policy** has been drafted to prevent certain conducts that limit or distort competition, the abuse of a

dominant position or acts of unfair competition affecting the public interest. Through our Policy, De Prado's professionals are given the tools they need to identify an organised or anticompetitive practice to prevent and, if necessary, stop it.

5.11. Responsible Taxation

- ▶ De Prado is firmly committed to supporting public taxes. The company has developed a corporate tax policy that seeks to manage fiscal matters by applying good tax practices and acting with transparency, preventing risks and ensuring compliance. De Prado has also rolled out mandatory internal policies and procedures for financial and non-financial reporting. It has joined the digital transformation, onboarding systems to enhance effective control over approval flows.

De Prado has developed a Decision Making Matrix (DLA), mandatory for all Group employees and officers, whereby each key decision that impacts the Group must be reviewed and approved by all the areas involved prior to being put into practice. This helps prevent and control risks deriving from the adoption of certain decisions. The DLA takes the form of a power structure for all officers and managers and makes it possible to control the implementation of particular actions and company representation by employees and officers.

5.12. Supply Chain

- ▶ De Prado is across the impact of risks in the supply chain and the fact that, in order to be sustainable, it is necessary to demand sustainable practices from our employees and professionals. The Group has developed a supplier approval system that enables transparent and collaborative communication with suppliers and prevents risks derived from contracting them. Third parties must accept, understand and undertake to comply with the obligations of the Code of Ethics and, depending on each case, must have control and supervision procedures in place according to the industries they operate in.

5.13. Community Development and Local Participation

- ▶ De Prado actively engages in the economic, social and cultural development of the local communities where it operates. This includes supporting initiatives that foster local empowerment, such as promoting community employment, supporting small farmers and local businesses and participating in community projects. We also ensure that our operations have a positive and enriching impact on these communities.

6. Final Provisions

6.1. Approval and Modification of the Policy

This Policy has been approved by the De Prado Board of Directors and ESG Committee and all the Group's subsidiaries have been made aware of it. It may only be modified by the ESG Committee following approval from the De Prado Board of Directors.

6.2. Noncompliance

Failure to comply with this Policy may result in disciplinary actions or termination of the business relationship, with no entitlement to compensation for the third party for this cause.

6.3. Interpretation

The CMD is responsible for settling concerns or discrepancies regarding the interpretation and implementation of this Policy.

6.4. Related Policies

This Policy must always be considered together with the other Group policies. The main related Group policies are specified below:

Code of Ethics	Code containing the minimum standards of ethical behaviour within the Group and which applies to all employees, professionals and third parties who have business dealings with the Group. Available on the De Prado website.
Anticorruption Policy	Set of rules and procedures defined by De Prado to prevent and detect corrupt practices. Available on the De Prado website.
Guide to Gifts and Donations	Procedure established by De Prado to correctly manage gifts and donations in order to prevent potential conflicts of interest under the terms defined in this Policy and to fight corruption.
Conflict of Interest Policy	Set of rules and procedures implemented by De Prado to prevent situations whereby the personal interests of employees collide or may collide with the interests of the company, ensuring objectivity and transparency across the Group.
Harassment Procedure	Procedure established at De Prado setting out preventive and reporting measures to avoid and eradicate harassment and bullying of any type (mobbing; sexual harassment; gender-

	based harassment; degrading, hostile or humiliating treatment; physical violence...) within the company.
Financial and Non-Financial Reporting and Corporate Policy	Set of rules defined by De Prado establishing the principles and control mechanisms implemented by the company to promote the accuracy, traceability and transparency of the company's financial, non-financial and corporate information.
DLA	Decision-making matrix setting out the levels of decision-making authority within the Group with respect to a defined set of key decisions.
Powers Policy	Set of rules defined by De Prado establishing the criteria to grant powers of attorney and delegate proxy powers to Group employees, setting limits and checks.

6.5. Promotion of Policy

This Policy is available to all employees on the Employee Portal.

The Compliance Department will run training courses for all employees on internal Compliance rules.

6.6. Versions

Version	Change	Date
Version 1	Document creation	1 March 2024