

1. PRESENTATION

With this document, **Sustainable Agro Solutions, S.A.** aims to ensure responsible behaviour in the development of its activity, beyond the mandatory compliance with the law. This Code reflects the principles that must guide the conduct of our company, of all the people who make part of the company, as well as our collaborators and business partners, with the aim of establishing with our stakeholders a relationship of commitment, dialogue, efficiency, integrity, respect, responsibility, transparency and service vocation.

All the people who belong to **SAS** must ensure compliance with the Code of Ethics and Conduct in the development of their professional activity. Its content cannot approach each possible situation, although it may serve as a principle that inspires actions.

2. SCOPE AND APPLICATION

This Code will be distributed to all persons who are part of the **SAS** human capital team. It is the responsibility of all personnel to comply with it and to report to their superior or to the Safety, Health and Ethics Committee all actions that may alter or violate it. Management is committed to reviewing and resolving any doubts in relation to it and to overseeing its transmission and application in all the company's activities.

In the event of an infringement, **SAS** is committed to taking immediate action, always consisting of an exhaustive investigation and analysis of the causes of the infringement, and the proposal of appropriate corrective measures, with the possibility of applying the sanctions considered appropriate, up to and including termination of the employment relationship.

Such measures shall also apply to anyone who orders, approves or has knowledge of infringements and does not act immediately to correct them.

Anonymous complaints will be dealt with zealously by the Safety, Health and Ethics Committee. In no case will the person making the complaint be penalized, although those complaints that, formulated under proven bad faith, turn out to be false or irresponsible will be strictly repressed. The Committee will deal secrecy with each case, both on the identity of the complainant and the circumstances complained about until the root of the problem has been reached.

The Code of Ethics and Conduct enters into force on the day of its communication and will remain in force until its cancellation is approved or until it is modified.

3. DEVELOPMENT

A. Commitment to the Organization

Conflict of interest

All personnel are obliged to give priority to the interests of SAS over their personal interests or those of third parties who may influence decisions, actions, services or other matters carried out on behalf of the company.

Confidentiality and protection of personal data

All persons who make part of **SAS** must be cautious, prudent and discreet with the information to which they may have access, particularly personal data, assuming and guaranteeing the strictest professional secrecy, refraining from providing third parties with information that may harm the company or any of its stakeholders, or that may represent a violation of personal data protection legislation.

Good use of assets

All personnel have the obligation to safeguard the assets and tools of the company and warn when they are not in perfect condition.

B. Commitment to the Human Team

Equal opportunities and non-discrimination

We must base our behaviour on the principle of equality and non-discrimination, and forbidding discrimination established on grounds of sex, origin, age, sexual orientation, thought, religion, custom or disability, whether in the selection process, promotion, access to training and/or remuneration.

Respect for freedom of association and collective bargaining

SAS respects the right of workers to associate, organize and bargain collectively without this resulting in any discrimination.

Prevention of harassment or bullying

No employee has the right to disturb or offend any other for any reason or circumstance. We must maintain an environment free of any conduct that may be considered harassment or intimidation, whether sexual or otherwise, in the workplace, on business trips or at social events related to our activity.

Balancing work and personal life

SAS facilitates, as far as possible, the balancing of personal, family and working life of the people who make part of the organisation.

Safety and health

SAS ensures the improvement of working conditions aimed at raising the level of protection of people's health and safety, committing itself to preventing and acting against those risks that may cause harm to people's health and/or safety, avoiding those risks that can be eliminated and minimising those that cannot be avoided, providing adequate training, providing the necessary protective equipment and supervising and informing people of any risk situation.

All persons have the duty to follow the established safety regulations and to make proper use the machines, dangerous substances, means and protective equipment provided, as well as to communicate any dangerous situation they may observe in order to take the appropriate corrective actions.

Good working environment

Each of the people who make part of **SAS** has an obligation to foster a work climate in which people feel integrated, comfortable and respected, regardless of their personal differences, their abilities or their physical or psychological characteristics.

C. Commitment to Clients/Consumers

Satisfaction

All actions related to our clients/consumers must be oriented to the continuous striving to satisfying them. For that reason, we will use a personal treatment towards them with a maximum dedication, in an integral, honest and correct manner.

Quality and safety

SAS pays special attention to the quality and safety of our products, continuously investing in research to adapt them to the expectations and needs of our clients/consumers, while communicating technical specifications, including safety, health and environment information, as well as conditions of use and conservation.

In addition, and in the event of any anomaly being discovered after delivery, we commit to inform them and to take the necessary measures for its repair or replacement.

Advertising

The advertising must never be a means of abusing the good faith of the consumer, nor must it be misleading.

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Corruption

Entertainment and corporate gifts must be in accordance with general **SAS** rules and according to the approved budget items.

No member of the organization will accept personal gifts, except those that are permitted, nor bribes to improve the particular conditions of a client vis-à-vis the rest.

D. Commitment to Suppliers and Distributors

Evaluation

SAS evaluates all of its suppliers and distributors, favouring those that show a behaviour that respects our values and principles, and specifically, those who respect the principles recognized by the Universal Declaration of Human Rights and those established in the International Work Organization Conventions in relation to forced labour, minimum work age, union freedom, discrimination and exploitation.

Stability and Integrity

SAS wishes to establish long-lasting relations with those suppliers and distributors who would like to grow with us, respecting their private interests and avoiding any practice that may reduce their decision freedom or interfere with the development of the commercial relations, such as accepting cash or in-kind gifts (except for appropriate commercial promotions or internal use material or Christmas gifts that do not go beyond a reasonable amount compared to those used for business).

E. Commitment with the Competition

Fair competition and free market

SAS respects the property rights of its competitors and the free market, encouraging recourse to agreements between the parties or arbitration formulas as a means of resolving differences in this respect. Furthermore, **SAS** does not undertake improper actions to collect information about its competitors nor does it disseminate distorted or tendentious information against its competitors.

Cooperation and alliances

SAS encourages its incorporation into associations and forums of common interest, which serve as a meeting and exchange of experiences with our competitors.

F. Commitment with the Applicable Legislation

Collaboration with Administrations

SAS establishes the channels of communication and dialogue that it considers appropriate with the Administrations with which it is related in order to cooperate in the development of a culture of social responsibility in the communities in which it operates.

Law Enforcement and Crime Prevention

SAS is committed to knowing and complying with all applicable legislation in the countries in which it operates, responding, if necessary, to the requirements of any Administration in a truthful and transparent manner.

It will ensure the training, awareness, control and responsibility of internal and external collaborators for the fulfilment of legal obligations and the prevention of crimes committed on behalf of or in the activity of the organization.

Corruption

SAS is committed to refrain from making, directly or indirectly, financial or in-kind contributions to political parties, politically related organizations or individuals, or public administration officials, as a means of obtaining advantages in commercial relations and/or obtaining undue benefits.

G. Commitment to the Social Context and the Environment

Collaboration

SAS is committed to collaborating actively with its host environment, participating and contributing to economic and social development in the geographical areas in which it operates.

Precautionary Principle

SAS is committed to adopting a precautionary approach, evaluating, developing and marketing only those products that are safe and fair for the social context and the environment, as well as the continuous improvement of our processes, in order to prevent and/or reduce their negative impacts.

H. Commitment to Shareholders

Good governance

SAS' relationship with any of its investors follows the principles of truthfulness, transparency, loyalty, and sustainable value creation, in a commitment to making public and accessible to all stakeholders the results of the company in the three axes of sustainability: economic, social and environmental.

MANAGING DIRECTOR

15 October 2018