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## 1. Why is the Code of Conduct important?

The Code of Ethics is important because it is a tool through which we communicate the expected behavior of our people, with the purpose of strengthening corporate ethics and preventing practices that could jeopardize the integrity of the Company and our employees. It also serves as a guide to help identify risk situations—compromising circumstances that could result in violations of the law.

## 2. Our Mission, Vision and Values

### **Our Mission**

David del Curto SpA is a company with history and tradition, a leader in the fruit export business since 1953. Therefore, our mission is to produce and supply fresh fruit to the most important markets worldwide, maintaining the prestige and quality of our products, while strengthening our business relationships based on ethics, closeness, and trust.

### **Our Vision**

To provide fresh fruit to the entire world, maintaining a constant focus on research and the adoption of new technologies, and encouraging the implementation of operational systems and marketing strategies that optimize results for the Company, its growers, and its customers.

### **Our values**

Our track record and our people are the Company's most important values. Through our Code of Conduct, we seek to provide a practical guide to help identify situations that could put at risk both our employees' reputation and the Company's reputation.

Our Code of Conduct is an affirmation of our commitment to integrity at both personal and corporate levels. We aim to continue growing under the highest quality standards, working with ethics, responsibility, and honesty, while integrating environmental care into our operations.

## 3. Who must comply with the Code of Conduct?

All individuals who maintain an employment relationship with David del Curto SpA and/or its subsidiaries must comply with the Code of Conduct.

## 4. Employee responsibilities

- Comply with the rules and regulations inherent to your role.
- Understand and comply with the contents of the Company's Code of Conduct.
- Raise any concerns regarding work-related conduct that may violate the law and/or this Code or Company policy.
- Cooperate with all internal and external audits and investigations.

## 5. Responsibilities as a leader

If you supervise other employees or hold a leadership position, you must lead by example and always adhere to the highest standards of conduct.

Make sure to:

- Know the content and purpose of the Code of Conduct
- Ensure employees under your supervision understand the Company's policies and procedures
- Maintain an active role to ensure ethical best practices in your team's work
- Encourage employees to report any errors or conflicts of interest, raise concerns, or seek guidance in complex situations through the available channels
- Address concerns quickly and effectively, and take action when errors occur or misconduct arises

## 6. Our Principles

### 6.1 Labor Practices

The labor practices of David del Curto SpA and all its subsidiaries are grounded in ethics and comply with the labor laws and regulations of the countries where we operate. We also respect and comply with the Universal Declaration of Human Rights and the principles of the ILO (International Labour Organization). This includes, but is not limited to, rejecting any form of modern slavery such as: child labor, forced labor, human trafficking, migrant smuggling, and ensuring compliance with minimum wage, working hours, overtime, rest days, compensation, and freedom of association.

### 6.2 Respect

David del Curto SpA is committed to maintaining a work environment in which all personnel are treated with dignity and respect. Likewise, Company personnel must serve as role models of respectful behavior within the organization and in interactions with our customers.

### 6.3 Fairness and Opportunity

David del Curto SpA believes in the principle of equal opportunity for all people; therefore, we do not discriminate based on race, sex, ethnicity, age, religion, sexual identity, or marital status. Under this same principle, we respect equal rights and pay equity for men and women.

### 6.4 Zero Tolerance for Harassment

Harassment is conduct or behavior considered humiliating, intimidating, or offensive; therefore, we condemn all forms of harassment, whether workplace harassment, sexual harassment, or abuse. If you have any doubts about this topic, you must contact someone who can properly channel the issue.

This may be a trusted person, your supervisor, the Compliance representative, and/or Human Resources. It is important to note that you may also report through the Whistleblowing Channel, anonymously or not.

## 6. Our Principles

### **Conduct considered harassment includes:**

- Verbal conduct, such as inappropriate comments, remarks about someone's body or clothing, derogatory comments, insults, or unwanted sexual proposals or insinuations
- Unwanted or offensive physical contact
- Preventing or blocking an employee's movement
- Other types of harassment through social media (chats), photographs, videos, drawings.
- Distributing or displaying photographs, images, or offensive material to an individual or group
- Jokes or public statements related to age, race, gender identity, sexual orientation, religion, family status, or marital status
- Threats or demands implying that an employee must comply with sexual requests to keep their job, avoid any other loss, or obtain workplace benefits in exchange for sexual favors
- Retaliatory actions against an employee for reporting or threatening to report acts of harassment

### **How do we avoid these situations?**

- Treating each other with respect and dignity
- Always remember that our activities take place within a work context
- Never assume all cultures are the same
- If someone's actions or behavior make you uncomfortable or seem offensive, tell the person how you feel and ask them to stop
- If you do not feel comfortable doing so, or if that does not resolve the issue, speak immediately with your supervisor, area manager, or contact Human Resources or the Compliance Officer. The Whistleblowing Channel is also an option.

## 7. We Are a Company with High Ethical Standards

### **7.1. We do not bribe**

- We do not accept, offer, give, or promise bribes of any kind, for any purpose, to anyone.
- We also prohibit facilitation payments (payments to speed up procedures).
- We do not authorize third parties to engage in bribery on our behalf under any circumstances.
- We must not accept, give, offer, or promise anything of value to a customer, potential customer, government official, or others.
- We must communicate our strict anti-bribery stance to employees, business partners, and third parties we work with.
- We must immediately report any suspected or actual instance of bribery

## 7. We Are a Company with High Ethical Standards

### 7.2 We Do Not Facilitate Money Laundering or Financial Crimes

Money laundering is conduct aimed at concealing the origin or nature of proceeds derived from criminal activities. We adhere to Law 20.393 (see Section 11.1).

- We conduct due diligence to assess the integrity of our business partners, customers, and suppliers
- Be alert to any warning signs or suspicious indicators that could suggest illegal conduct by customers or suppliers
- Be cautious with prospective customers who have been linked to financial crimes or money laundering allegations, or who refuse to properly document a transaction or relationship
- Transactions that have no business purpose or are inconsistent with the business strategy or the customer profile
- We include a clause regarding Law 20.393 in employment contracts and in contracts with suppliers/contractors

### 7.3 Our Relationship with Government Officials

We commit to complying with the strictest ethical codes and applicable legal requirements when working with government agencies or authorities.

### 7.4 Free Competition and Fair Competition

We believe in free competition as a way to promote the virtues of the market as the primary regulator of economic activity. Therefore, we commit to strictly observing the conduct required by Decree Law 211/73 and other rules issued by competition regulators.

We are committed to fair and honest competition, ensuring room for equitable development among growers, suppliers, customers, competitors, and consumers

### 7.5 Conflicts of Interest

A conflict of interest is a situation in which competing loyalties could lead you to pursue a personal benefit for yourself, your friends, or your family at the expense of the Company. Conflicts may arise in different scenarios, and you have the responsibility to avoid these situations and circumstances that could potentially lead to a conflict of interest.

Make sure to:

- Not engage in outside work or accept employment that could harm the Company, interfere with your job, or affect the Company's reputation.
- Not pursue business opportunities for yourself when such opportunities are appropriate for the Company.
- Declare any conflict of interest or uncertainty about the situation

### 7.6 Gifts & Invitations

In the workplace, a modest gift can be a gesture of appreciation; similarly, in an appropriate setting, a meal can help strengthen business relationships with a customer. However, when

## 7. We Are a Company with High Ethical Standards

these are repetitive, excessive, and/or out of context, they may appear to improperly influence decisions, create an unintended obligation, or involve bribery-related offenses.

Make sure to:

- Do not give or accept anything of value unless it is legal and reasonable, for example: corporate mugs, corporate pens.
- If it is another type of gift, it may not exceed CLP 20,000 and may not be repeated over time.
- If you have doubts about any invitation or gift you have received or may receive, consult your direct manager or the Company's Compliance area.
- Never give or receive a cash gift or cash equivalent

### 7.7 Whistleblowing Channel

The Whistleblowing Channel aims to provide a reliable internal and external mechanism to report irregularities and/or suspected irregularities without fear of retaliation. These include: breaches of the Code of Conduct, harassment, fraud or corruption, unethical conduct, and/or legal violations.

All reports are handled confidentially to protect the identity of the whistleblower if they identify themselves.

Reports may be anonymous; however, the whistleblower should consider that if additional information is required and we cannot contact the reporter, the investigation may not progress as expected.

No retaliation will be taken against any person who makes a report in good faith. Likewise, we expect this channel to be used responsibly and truthfully, and not to harm others without merit.

#### Whistleblowing Channel

- You can access it through our website [www.daviddelcurto.cl](http://www.daviddelcurto.cl) , and search for the whistleblowing channel
- You can access it directly at the following address: [denuncias.daviddelcurto.cl](http://denuncias.daviddelcurto.cl)

## 8. Information and Our Assets

### 8.1 We Protect Company Information

We protect and treat as confidential the information of our personnel and our customers.

- It is prohibited to collect, use, transmit, or retain customer or Company information fraudulently or for unauthorized purposes
- It is prohibited to falsify any customer or Company document
- Company and customer information is "Confidential" and for exclusive use within the regulated work and commercial environment

## 8. Information and Our Assets

- We are responsible for properly safeguarding physical and digital information
- We are responsible for protecting intellectual property by sharing it only with authorized parties and complying with copyright and other intellectual property laws
- Consider signing confidentiality agreements, if necessary

### 8.2 We Protect Company Assets

We protect the Company's assets and are responsible for using them responsibly. Assets may include work tools, supplies, equipment, information systems, and intellectual property located in our packing facilities, fields, and Head Office.

## 9. Our Internal Management Control

### 9.1 Accurate Records, Contracts, and Strong Internal Controls

We depend on complete and accurate business records to meet our responsibilities to shareholders, customers, suppliers, regulators, and others. We must maintain robust business records. This includes bids, receipts and disbursement vouchers, settlement statements, inventories, reimbursements, contracts, emails, presentations, reports, and accounting records that are complete, fair, accurate, and aligned with our internal control system.

- Records and supporting documentation must be uploaded on time and properly
- They must accurately reflect the true action or transaction required for our internal controls
- Never accept a service or similar without first having a contract signed by both parties involved.
- Only sign documents, including contracts, that you have reviewed, are authorized for signature, and that you ensure are true and appropriate.
- Carry out financial transactions only with proper authorization, and retain them for control under our financial practices.

## 10. Health, Safety, and Environment

We are committed to safeguarding the safety and integrity of our personnel in a safe work environment. Likewise, we expect all personnel to comply with applicable rules and standards. David del Curto SpA is committed to respecting environmental standards in the communities where it operates; therefore, our commitment is to:

- Comply with the Company's and the country's Health, Safety, and Environment policies, standards, and practices
- Promote and support among employees and third parties environmentally respectful behavior and sustainable activities
- Be responsible for our safety, health, and well-being at work by using personal protective equipment and tools in accordance with requirements and regulations
- Actively participate in preventing unsafe actions and/or conditions related to Health, Safety, and Environment, or refuse to work in an unsafe environment that could create imminent risk to ourselves and/or others

## 10. Health, Safety, and Environment

- Report Health, Safety, and Environment incidents in accordance with the Company's Health, Safety, and Environment Management System
- Under no circumstances may anyone enter the facilities—much less work—after consuming substances such as alcohol, drugs, or other psychotropic substances

## 11. About Our Laws

### 11.1 We Adhere to Law 20.393

Law 20.393 — the Chilean Anti-Corruption Law on Corporate Criminal Liability — establishes a catalogue of offenses and provides that legal entities will be liable for offenses committed directly and immediately in their interest by their owners, controllers, responsible parties, senior executives, representatives, or those performing management and supervisory activities, provided that the commission of the offense resulted from the legal entity's failure to fulfil its duties of direction and supervision.

Likewise, a legal entity is criminally liable when offenses are committed by individuals under the direct supervision of any of the persons mentioned above. Duties of direction and supervision are deemed fulfilled when, prior to the offense, the legal entity has adopted and implemented a Crime Prevention System in accordance with Law 20.393.

The following offenses are covered by this Law:

1. Bribery
2. Money Laundering
3. Terrorist Financing
4. Receiving Stolen Goods
5. Incompatible Negotiation
6. Bribery Between Private Parties
7. Disloyal Administration
8. Misappropriation
9. Water Pollution
10. Closed-Season Violation for Products (N/A)
11. Illegal fishing of seabed resources (N/A)
12. Illegal processing and storage of scarce products (hydrobiological resources or derivatives thereof) N/A
13. Failure to observe isolation or other preventive measures ordered by the health authority in the event of an epidemic or pandemic
14. Fraudulent receipt of unemployment subsidy
15. Weapons Control Law
16. Migration and Immigration Law
17. Cybercrime Law:
  - a) Attack on the integrity of a computer system
  - b) Illegal interception
  - c) Forgery of computer data
  - d) Receiving stolen computer data
  - e) Computer fraud
  - f) Misuse of devices

## 11. About Our Laws

### 11.2 Law 20.000 — Illicit trafficking of narcotics and psychotropic substances

It is a crime to traffic, under any title, drugs or narcotic/psychotropic substances, or the raw materials used to obtain them; as well as to induce, promote, or facilitate the consumption of such substances. Trafficking includes importing, exporting, transporting, acquiring, transferring, stealing, possessing, supplying, storing, or carrying such substances or raw materials involving narcotics and/or illicit substances.

## 12. Considerations for Making Ethical Decisions

When you need to make a decision or are unsure what to do, ask yourself:

- Is it legal?
- Is it ethical?
- Is it consistent with this Company Code of Conduct and the law?
- Do I fully understand the risks involved?
- Will it maintain the trust of my colleagues, leaders, and customers?
- How would our good reputation be affected if it appeared on television, in the newspaper, or on the internet?



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