

CODE OF ETHICS AND CONDUCT

Rev. 02

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#### **GENERAL INFORMATION ABOUT THE COMPANY**

1	RUC NUMBER	1791404785001		
2	BUSINESS NAME	NOVA ALIMENTOS ALIMENVOSA SA		
	ACTIVITY	PRODUCTION AND SALE OF FRUITS AND		
3	ECONOMIC	FRESH AND FROZEN VEGETABLES		
		WHOLESALE AND RETAIL		
4	SIZE OF THE	BIG COMPANY		
	COMPANY			
5 <b>W</b>	ORK CENTERS	ONE		
	ADDRESS	PANAMERICAN NORTH KM 20,		
6		DIAGONAL TO THE SANCELA DEL FAMILY		
		ECUADOR, LASSO-COTOPAXI.		

# INTRODUCTION

This Code of Ethics and Conduct of NOVA Alimentos Alimennovasa SA, seeks materialize and reinforce the application of values and principles through clear definition how to conduct our professional actions; through the highest standards of honesty, integrity and conduct, strengthening business reputation.

# **INSTITUTIONAL VALUES**

*Transparency:* maintains a culture of transparent service and information, and from scratch tolerance towards corruption.

*Respect:* we promote efficient, friendly, cordial and warm communication between the collaborators.

Honesty: committed to establishing interpersonal relationships based on trust, sincerity and mutual respect.

Loyalty: express a feeling of respect and loyalty towards collaborators, the company, organizations, moral principles, among others.



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Confidentiality: protect and respect the information we handle.

*Innovation:* making use of technological advances to benefit product improvement offered.

#### **GOALS**

- Promote business values, principles and responsibilities so that everyone collaborators can understand, respect and practice them.
- Create awareness among workers and employees about the benefit and application of the standards established in the Code of Ethics and Conduct.
- Contribute to ensuring that these values are respected individually and collectively in NOVA Foods Alimennovasa SA

# TO WHOM DOES THIS CODE APPLY?

This code is applicable and mandatory for all collaborators who in any modality or in any capacity work, provide services or hold a position, function or dignity within NOVA Alimentos Alimennovasa SA, independently of their hierarchical level. Your application examines the relationships of the following groups of interest:

- All collaborators
- Clients, suppliers, banks, and other allies
- The State and public sector at all levels
- Society in general and the local community



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#### **RESPONSIBILITY AT WORK**

# Our relationship with the company

Employees must maintain respectful, honest behavior, with warmth and open to dialogue with others, thus strengthening commitment and meaning belonging to NOVA Alimentos Alimennovasa SA; Therefore we consider that the Success depends on us, therefore, the functions must be fulfilled consciously, committed, seeking to achieve the objectives and goals, always in an agile manner according to the principles of effectiveness and warmth.

#### Respect, fair and dignified treatment

Respect is a concept that refers to the ability to value and honor another person, both his words and his actions. The treatment in our workplace towards collaborators, suppliers and clients must be based on standards of respect, courtesy and fair treatment, without humiliation, offenses, criticism or rumors creating an environment of security and cordiality.

# **Equal opportunities**

NOVA Foods Alimennovasa SA promotes equality both in treatment and in opportunities for men and women in the selection, hiring, training and working conditions for its collaborators, where each individual has the opportunity to achieve their full professional and personal potential contributing to the continued success of our company; regardless of race, color, nationality, social origin, age, sex, sexual orientation, ideologies, political opinions or any other physical condition, social or personal.



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## Compensation and work hours

NOVA Alimentos Alimennovasa SA in accordance with the current regulations of the Ministry of Labor pays fair wages to collaborators for the work performed, respecting the principle of equality and non-discrimination based on gender in labor matters.

# Child labor and minimum hiring age

In order to protect the physical health and well-being of children and adolescents, the company refrains from hiring underage workers in accordance to the law.

# Privacy and data protection

NOVA Alimentos Alimennovasa SA handles personal data confidentially which are effectively protected for legitimate purposes.

#### Absence of harassment and discrimination

Any type of physical, sexual, verbal, mental or other form of abuse is totally prohibited. of harassment, also understanding as discrimination an unwanted behavior, which is based on race, color, religion, sex (including sexual orientation, identity gender and pregnancy), national origin, age and disability, NOVA Foods Alimennovasa SA totally prohibits these actions;

If you have observed or think you have been subject to them, you must notify them. to the Immediate Boss or the Human Talent Department, to give rise to a measure disciplinary.

#### Neither weapons nor violence

The collaborators of NOVA Alimentos Alimennovasa SA must seek respect by their co-workers, regardless of the hierarchical level to which they correspond and exercise their mandate with integrity, responsibility and respect.



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Inside the company facilities, the entry of weapons and any other type of weapon is prohibited. actual or potentially hostile or threatening conduct that could create a risk to our life or safety; If you observe these actions, you must report them to the Human Talent Department, Occupational Safety Department or Management General, to immediately take disciplinary measures.

#### **Drugs and alcohol**

NOVA Alimennovasa Foods SA, we are committed to providing our collaborators a safe and healthy work environment, which is why their collaborators who work under the influence of alcohol, illegal drugs or improperly used medications.

## Smoking prohibited in the workplace

Smoking represents a potential health risk to the smoker and to others around him. around, so smoking is totally prohibited inside the facilities.

NOVA Foods Alimennovasa SA according to the declaration of spaces 100% free of tobacco smoke from the MSP.

# RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND THE COMMUNITY

# Compliance with laws and regulations

NOVA Foods Alimennovasa SA and its collaborators, we comply with the rules and regulations not only in our professional but also personal actions. The The company maintains clear policies and guidelines on matters of production and dispatch of frozen foods, through the execution of activities that guarantee the Quality, Safety and Harmlessness of our products, respecting our environment and providing satisfaction and care for the needs of our clients, staff and other interested parties.

Therefore, we exclude fraud and fraud from our commercial and personal relationships. corruption that are included in the following practices are not limited to:



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## - Corrupt practice:

Under this precept, NOVA Alimentos Alimennovasa SA does not carry out activities that may be considered corrupt in their relationships with their interest groups. Servers cannot, under any justification, give or receive any form of payment or other benefit to intervene in making a decision that suits the address, to the server or to a third party.

#### - Collusive practice:

An agreement between two or more parties to achieve an improper purpose is prohibited, including other things, to improperly influence the actions of a third party.

#### - Coercive practice:

The company does not admit the threat of causing impairment or damage, direct or indirectly, to any party or its assets, to improperly influence the action of said party.

# Our relationship with the client

NOVA Foods Alimennovasa SA is committed to its clients to offer quality products, maintaining a relationship based on trust, respecting their rights and needs.

NOVA Alimentos Alimennovasa SA guarantees the confidentiality of the data of its clients agreeing not to reveal them to third parties, except with the consent of the client or by legal obligation, or compliance with judicial resolutions or administrative. The collection, treatment and use of this information will be done in accordance with the applicable legal requirements for this purpose.

# Acceptance of gifts and invitations

NOVA Alimentos Alimennovasa SA promotes ethical business practices and a responsible business conduct for which employees cannot give or accept



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gifts and gifts in the development of their activities. Exceptionally, it is practical may be accepted when it comes to promotional elements.

#### **Supplier selection**

Suppliers are an important part of our business, a service is expected from them. quality, innovative and efficient, providing good value for money, following the laws and regulations that apply to them in addition to caring for the environment environment and to observe health and safety standards in the performance of their work.

The supplier selection processes are carried out within the framework of the principles of objectivity, impartiality, legality, fair treatment, equality, quality, opportunity, concurrence, and transparency. Collaborators who have access to the Supplier information must apply the necessary measures to guarantee its confidentiality and avoid conflict of interest.

#### Relationship with society

NOVA Alimentos Alimennovasa SA has a relationship of permanent dialogue and respect with society and especially with the communities present in its areas of operation.

## **CONFLICT OF INTERESTS**

A conflict of interest occurs when when making a decision, making or omitting an action action, the server must choose between his personal interest and that of the company. In front of a possible conflict of interest, collaborators must act under the following guidelines:

- Freedom of judgment and loyalty to their interest groups, so they will refrain from favor their own interests at the expense of the interests of the Company.
- Avoid influencing or intervening in decision-making with which you have conflict.
- Inform the higher level of decision-making regarding conflicts of interests in which they are involved.



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#### **FINANCIAL INTEGRITY**

#### Financial books and records

The financial records of NOVA Alimentos Alimennovasa SA constitute the basis to manage the business of the Company and to fulfill its obligations towards the different interested parties. Therefore, all financial records must be accurate and in accordance with the accounting principles of NOVA Alimentos Alimennovasa SA To the extent permitted by applicable law.

#### **CONFIDENTIAL INFORMATION AND PRIVACY**

#### Confidential information

NOVA Alimentos Alimennovasa SA guarantees the confidentiality of the data of its clients agreeing not to reveal them to third parties, except with the consent of the client or by legal obligation, or compliance with judicial resolutions or administrative. The collection, treatment and use of this information will be done in accordance with the applicable legal requirements for this purpose. Collaborators who have access to customer data must take the necessary measures to maintain its confidentiality and in no case can they use this information for activities different from those established by the Company.

In the event of disclosure of confidential information by NOVA personnel Alimennovasa SA Foods must report the incident to their Immediate Boss or General management.

#### USE OF THE GOODS OF NOVA ALIMENTOS SA

# Use of the goods

We protect and preserve the tangible and intangible assets of NOVA Alimentos SA, as well as its efficient use to contribute to the achievement of business objectives. The Collaborators have the obligation to use the Company's assets and resources only for the purposes for which they were entrusted to them. Any employee or supplier,



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Contractor and subcontractor are required to report theft, fraud and other actions dishonest actions related to the assets and resources of the Company when you become aware of it.

# Use of conventional telephones, cell phones, email, internet and others electronic media

The company's electronic media are intended for the use of the company, therefore, They should not be used for any purpose that violates the code. However, NOVA Foods Alimennovasa SA strictly prohibits the downloading or transmission of messages or materials whose content is greater than the permitted capacity and/or threatening, obscene, dangerous, illegal, unethical or inappropriate in its subject matter. This activity will be subject to disciplinary action.

# MANAGEMENT IN SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION

# Security and health at work

One of our primary responsibilities is to protect health, safety and lives. of the people who visit or work in our facilities. At NOVA Foods Alimennovasa SA is committed to:

- Prevent risk factors, as an unavoidable social obligation to NOVA Foods Alimennovasa SA
- Comply with the applicable technical-legal legislation regarding Health and Safety
   Occupational, providing adequate conditions for the development of skills
   activities of our collaborators.
- Promote teamwork and continuous improvement of our organization,
   with the allocation of economic resources and technical human talent, for the execution of our activities.
- Create awareness among workers and employees about the benefit that the application of the rules established in the Internal Regulations of Hygiene and Security.



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 Avoid accidents and/or occupational diseases, establishing standards adequate to protect the safety and health of all its collaborators.

#### **Environmental protection**

NOVA Foods Alimennovasa SA is committed to carrying out its operations in an environmentally responsible manner through continuous improvement, to protect human health, natural resources and generate the least possible environmental impact. We responsibly assume the effects that our activities could have on the environment, undertaking actions of restoration of ecological balance in our activities.

# Promote a culture of ethics and compliance

Department Heads and Managers must always be role models and as such, has additional responsibilities under the Code.

- Ensure that the people you supervise understand their responsibilities according to the Code and other internal policies.
- Take advantage of opportunities to hold interactive talks with collaborators who work and reinforce the importance of ethics and compliance.
- Create an environment where employees feel comfortable presenting concerns, listening carefully, asking for clarification and information additional if necessary.
- Always act to prevent violations of the Code by those under their supervision.

Update date:	State:	Approved by:	
January 2024	Current	General manager	
		CEO	