	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

Page 1 of 11

GENERAL COMPANY DATA

1	RUC NUMBER	1791404785001
2	COMPANY NAME	NOVA FOODS ALIMENVOSA SA
3	ACTIVITY ECONOMIC	PRODUCTION AND SALE OF FRUITS AND FRESH AND FROZEN VEGETABLES WHOLESALE AND RETAIL
4	SIZE OF THE COMPANY	BIG COMPANY
5	WORK CENTERS	ONE
6	ADDRESS	PANAMERICANA NORTE KM 20, 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 performance; through the highest standards of honesty, integrity and conduct, strengthening business reputation.


INSTITUTIONAL VALUES

Transparency: maintains a culture of service and transparent 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: expressing a feeling of respect and fidelity towards collaborators, company, organizations, moral principles, among others.

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

Confidentiality: safeguarding and respecting the information we handle.

Innovation: making use of technological advances to improve the product offered.


GOALS

- Promote business values, principles and responsibilities so that everyone collaborators can understand, respect and practice them.
- Raise awareness among workers and employees about the benefits and applications 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 title, work, provide services or hold a position, function or dignity within NOVA Alimentos Alimennovasa SA, independently of their hierarchical level. Its 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

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

CODE OF ETHICS AND CONDUCT

RESPONSIBILITY AT WORK

Our relationship with the company

We collaborators must maintain respectful, honest behavior, with warmth and open to dialogue with others, thus strengthening commitment and sense belonging to NOVA Alimentos Alimennovasa SA; therefore we consider that the Success depends on us, therefore, we must perform our functions consciously, committed, seeking to achieve 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 their words and their actions. The treatment in our work environment 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 Alimentos Alimennovasa SA promotes equality in both treatment and opportunities for men and women in selection, hiring, training and working conditions for its employees, where each individual has the opportunity to reach their full professional and personal potential contributing to the continued success of our company; regardless of race, color, religion, nationality, origin social, age, marital status, sex, sexual orientation, ideologies, political opinions or any other physical, social or personal condition.

Freedom of association

NOVA Alimentos Alimennovasa SA respects and promotes the free expression of its staff. by constituting a committee democratically elected by themselves, the

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

Page 4 of 11

who will be responsible for being the spokesperson for any issue that requires attention from the company, through good practices of collective bargaining where it is guaranteed that employers and workers negotiate on equal terms and that results are fair and equitable.

Compensation and working hours

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

The working day and hours shall comply with the requirements of national laws, respecting the labor code.

Child labor and minimum age of employment

In order to safeguard the physical health and well-being of children and teenagers, the company refrains from hiring underage workers.

I work in a regulated manner


In all aspects, the work performed is based on solid working relationships and legally recognized with our employees, according to the labor code and the social security system.

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 strictly prohibited. of harassment, understanding discrimination as unwanted behavior, which is based on race, color, religion, marital status, sex (including sexual orientation,

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

gender identity and pregnancy), national origin, age and disability, NOVA

Alimentos Alimennovasa SA totally prohibits these actions;

If you have observed or think you have been subjected to them, you must notify to the Immediate Supervisor or the Human Resources Department, to give rise to a measure disciplinary.

Zero tolerance for violence against women

Violence is understood as any form of physical, sexual and emotional abuse or harm. psychological for women NOVA Alimentos Alimennovasa SA rejects these acts and respects, guarantees and promotes human rights in accordance with the social and cultural context labor.

Neither weapons nor violence

NOVA Alimentos Alimennovasa SA employees must ensure respect by their coworkers, regardless of the hierarchical level to which they correspond and exercise their powers of office with integrity, responsibility and respect.


Within the company's facilities, the entry of weapons and any other items is prohibited. actual or potentially hostile or threatening conduct that could create a risk to our life or safety; in the case of observing these actions, it must be reported to the Human Talent Department, Occupational Safety Department or Management General, to take immediate disciplinary action.

Inhuman and severe treatment

Physical abuse or punishment, the threat of physical abuse or punishment are prohibited. sexual or other harassment, as well as verbal abuse or other forms of intimidation.

Drugs and alcohol

NOVA Alimennovasa Alimentos SA, we are committed to providing our collaborators a safe and healthy work environment, which is why its employees are prohibited

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

employees who work under the influence of alcohol, illegal drugs or misused medications.

No smoking in the workplace

Smoking represents a potential risk to the health of the smoker and to others around him. around, so smoking is strictly prohibited within the facilities of NOVA Alimentos Alimennovasa SA in accordance with the declaration of 100% spaces smoke-free MSP.


RELATIONS WITH CUSTOMERS, SUPPLIERS AND THE COMMUNITY

Compliance with laws and regulations

NOVA Alimentos Alimennovasa SA and its collaborators, we comply with the rules and regulations not only in our professional but also personal actions. company maintains clear policies and guidelines on issues of a 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 customers, staff and other stakeholders.

Therefore, we exclude fraud and corruption from our business and personal relationships. Corruption that is included in the following practices is not limited to them:

- *Corrupt practice:* Under this precept NOVA Alimentos Alimennovasa SA, no carries out activities that may be considered corrupt in the relationship with its stakeholders. Servers may not, under any justification, give or receive any form of payment or other benefit for participating in the decision-making a decision that suits management, the server or a third party.
- *Collusive practice:* Agreement between two or more parties to obtain a benefit is prohibited. improper purpose, including, inter alia, to unduly influence the performance of a third.

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

- Coercive practice: The company does not admit the threat of causing damage or damage, directly or indirectly, to any party or its property, to influence improperly in the performance of said party.

Our relationship with the client

NOVA Alimentos Alimen novasa SA is committed to offering its customers quality products, maintaining a relationship based on trust, respecting their rights and needs.

NOVA Alimentos Alimen novasa SA guarantees the confidentiality of its customers' data. 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, processing and use of this information will be done in accordance with the legal requirements applicable for this purpose.


Acceptance of gifts and invitations

NOVA Alimentos Alimen novasa SA promotes ethical business practices and a responsible business conduct for which employees cannot give or accept gifts and presents in the course of their activities. Exceptionally, this practice may be accepted when it comes to promotional items.

Supplier Selection

Suppliers are an important part of our business, and we expect excellent service 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 safety and health 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 information providers must apply the necessary measures to ensure their confidentiality and avoid conflict of interest.

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

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 INTEREST

A conflict of interest arises when making a decision, carrying out or omitting a action, the server must choose between his personal interest and that of the company. Faced with a potential conflict of interest, collaborators must act under the following guidelines:

- Freedom of judgment and loyalty to their interest groups, so they will abstain 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 decision-making authority regarding conflicts of interests in which they are involved.

FINANCIAL INTEGRITY


Financial books and records

The financial records of NOVA Alimentos Alimennovasa SA constitute the basis to manage the Company's business and to fulfill its obligations to the various stakeholders. 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 its customers' data. 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

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

administrative. The collection, processing and use of this information will be done in accordance with the legal requirements applicable for this purpose. Collaborators who have access to customer data must take the necessary measures to maintain its confidentiality and under no circumstances may they use this information for activities other than those established by the Company.

In the event of disclosure of confidential information by NOVA staff Alimentos Alimennovasa SA the incident must be reported to your immediate supervisor or General Management.


USE OF NOVA ALIMENTOS SA ASSETS

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. Collaborators have the obligation to use the Company's assets and resources only for the purposes for which they were entrusted. Every employee or supplier, Contractor and subcontractor are required to report theft, fraud and other actions dishonest related to the assets and resources of the Company when it becomes aware of it.

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

The company's electronic media are intended for company use, therefore, must not be used for any purpose that violates the code. However, NOVA Alimentos 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.

	NOVA ALIMENTOS ALIMENNOVASA SA	
	<i>CODE OF ETHICS AND CONDUCT</i>	<i>Rev. 03</i>

SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION MANAGEMENT


Safety and health at work

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

- Prevent risk factors, as an unavoidable social obligation of NOVA Foods Alimennovasa SA
- Comply with the applicable technical and legal legislation regarding Health and Safety Occupational, providing adequate conditions for the development of the 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 benefits provided by application of the rules established in the Internal Regulations of Hygiene and Security.
- Avoid accidents and/or occupational diseases by establishing standards adequate to protect the safety and health of all its employees.

Environmental protection

NOVA Alimentos 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 lowest possible environmental impact. We responsibly assume the effects that our activities could have on the environment, taking action to restoring ecological balance to our activities.

	NOVA ALIMENTOS ALIMENNOVASA SA	
	CODE OF ETHICS AND CONDUCT	Rev. 03

Promote a culture of ethics and compliance

Department Heads and Managers should 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 conversations with collaborators who work and reinforce the importance of ethics and compliance.
- Create an environment where employees feel comfortable presenting concerns, listening to them carefully, requesting clarification and information additional if necessary.
- Always act to prevent violations of the Code by those under its jurisdiction.
your supervision.

SANCTIONS

Failure to comply with this code of ethics and conduct will be sanctioned in accordance with establishes the internal regulations, labor code and criminal actions depending on the seriousness, significance, recurrence and importance, respecting the right to defense and due process guarantees.

MEANS OF COMPLAINTS

- To the email address rrhh@nova.com.ec
- Through the complaints and suggestions mailbox.



Wilma Toscano
General manager



Marisol Hervas
President

Update date: April 2024	State: Current	Approved by: General manager Executive President
----------------------------	-------------------	--