



CODE OF ETHICS AND CONDUCT



INDEX

► VGT Portugal	3
► Code of Ethics and Conduct	4
► Commitments to the Entire Organization	4
► Commitments to Our Customers	5
► Commitments to Our Suppliers	6
► Commitments of Our Employees	7

A VGT PORTUGAL

VGT PORTUGAL is a subsidiary of a Dutch company, TBS B.V, having started its activity in 2009 in the ribatejana province, in Alpiarça. It was implemented in the fresh vegetable export market, with the aim of consolidating its leadership in the production and marketing of fresh vegetables.

It has an agro-industrial unit, the investment of which was made entirely with its own capital in 2010 and with the capacity to cold store around 800 tons of product and an agricultural production unit, the Cooperativa de Produção Agrícola Mouchão do Ingles, with 360ha, located in Alpiarça, with this unit being its main source of production.

The remaining production area is contracted to producer organizations and producers in the Algarve, West and Lisbon and Tagus Valley regions, always with the supervision, technical monitoring and responsibility of VGT PORTUGAL.

Its production is reflected in fruit and vegetable crops, namely heart cabbage, purple heart cabbage, Lombard cabbage, purple cabbage, white cabbage, butternut pumpkin, Hokkaido pumpkin, Musquee pumpkin and long pumpkin.

We are a company certified by **BRCS** (British Retail Consortium's Global Standard for Food Safety), **Global G.A.P.** (Worldwide Good Agricultural Practice Authority), **Tesco Nurture**, **GRASP**, **Sedex** (Supplier Ethical Data Exchange), **Agricultura Biológica (BIO)**, **Planet Proof** and **IFS** (International Featured Standard Food).



► Mission

Our mission is sustainable agricultural production that guarantees our customers the best quality of cabbages available on the European market so that, in partnership, they can obtain the highest possible profitability from the business.

► Vision

We believe that work, persistence, experience, commitment and sustainability are the most valuable parameters that contribute to the conduct of all its activities and will contribute to the fulfillment of its mission.

► Strategy and Objectives

Through an organization aware of its vision parameters, VGT PORTUGAL creates dynamics in all vital disciplines necessary for optimal performance and places programmed production, in its own and aggregated mode focused on food safety, as strategic and differentiating points in the activity to be carried out to developing. This strategy aims to solidify strategic partnerships with its customers, creating regularity in the product offering, making the business model more stable and with less investment risk, thus creating the ideal conditions to be the leader in cabbage production on the European market.

CODE OF ETHICS AND CONDUCT

This Code of Conduct sets out a set of values, principles, rules and ethical commitments, which must be adopted by all employees, regardless of the nature of their relationship and/or hierarchical position.

This Code must be considered as a guideline and criterion for action by all employees, aware that only compliance with it will allow them to achieve their purpose.

Compliance with the Code of Conduct does not exempt mere compliance with the law and company procedures. It involves incorporating the values and general principles set out here in all decisions made at the service of the company, so that, at all times, its employees can act correctly, ethically and honestly.

Violation of the principles and standards established here undermines the company's identity, as well as its credibility and reputation. All employees are required to familiarize themselves with this Code, attend training sessions directed at them and, when necessary, in carrying out their activities, disclose it to subordinates and partners, communicating any violations thereof, whenever they are aware of.

Failure to comply with the Code of Conduct may result in the application of disciplinary or other legally applicable measures.

COMMITMENTS TO THE ENTIRE ORGANIZATION

► Respect for the Law and Human Rights

VGT Portugal, Sociedade Unipessoal, Lda, conducts its activity with respect for the fulfillment of internationally recognized Human Rights, within the framework of the International Bill of Human Rights; of the Universal Declaration of Human Rights, the fundamental Conventions of the International Labor Organization and other agreements applicable in Portugal and other countries.

► Equal Opportunity and Non-Discrimination

Equal opportunities are intended for any employee, without direct and/or indirect discrimination, in admission, reception and integration, in promotion and attribution of extrinsic and intrinsic rewards, regardless of their ancestry, gender, sexual orientation, religion, age, marital status, family situation, nationality, ethnic origin, disability, political or ideological beliefs, trade union membership or any other criterion of a discriminatory nature. Any practice of discrimination, offense and harassment, with the aim of causing moral and physical harm to any employee will be punished.

► Child, Forced and Compulsory Labor

VGT Portugal condemns the existence of child, forced and compulsory labor in its organization, and does not tolerate such practices on the part of customers, suppliers or other business partners.

► Health, Safety and Hygiene

Provide all employees with a safe and comfortable working environment, providing all the resources necessary for the correct execution of each task, with the aim of reducing work accidents and injuries to the employee's health.

► **Training, development and recognition**

The company promotes personal and professional development, particularly through training and career development opportunities. A culture of recognition based on merit and justice is adopted, in which there is no place for any discriminatory factor. Remuneration policies are based on standards associated with promoting a balanced standard of living.

► **Harassment**

Ensuring that the work environment is defined as a place of mutual help, unity and reciprocal respect, not tolerating harassing behavior of a sexual, physical or moral nature.

► **Honesty and Integrity**

The company conducts its activity with honesty, rigor and integrity. Unacceptable behaviors are considered to include the practice of acts of corruption, influence peddling, obtaining or offering an undue advantage, paying or obtaining any benefits contrary to the law or this Code. Negotiation on your own or in competition with the company, with the aim of obtaining advantages, favors or personal benefits due to the position held or the functions performed, is considered unacceptable behavior, leading to punishments.

► **Diversity and Inclusion**

The company welcomes diversity and promotes inclusion, assuming them as competitive advantages in the way it operates and in its relationship with each administrator.

► **Personal Data Protection**

Due to the nature of the business, it operates and the universe of employees it employs, the company has access to countless personal data, the value of which it recognizes and respects, and the protection of which it ensures. Whenever it processes personal data, it does so in strict compliance with the rules that the law provides to protect the privacy rights of natural persons, including employees and customers.

COMMITMENTS TO OUR CUSTOMERS

The company understands that, in open and free markets, Customer trust, security and satisfaction symbolize a fundamental point of the business.

Consequently, employees must guarantee and use all methods so that the process of processing the products and services offered to the customer is of quality.

The company demonstrates its constant dedication to offering its customers a diversity of choice at competitive prices, complying with the highest safety and health standards, as well as transparent and appropriate commercial proposals, with attention to customer service and satisfaction being paramount.

Food sustainability practices must be ensured, with the company having to adapt its production/business together with the customer, based on a diagnosis of needs, preventing a socio-environmental impact, namely climate change, desertification and food waste.

COMMITMENTS TO OUR SUPPLIERS

The company recognizes the importance of a careful selection of suppliers to maintain the high standards of quality and sustainability it pursues.

When selecting its partners, the company intends to establish a lasting relationship with entities that share the same ethical principles it follows.

The selection of suppliers is carried out neutrally based on criteria that are based on quality, price, innovation capacity, supply capacity, continuity, trust, performance and sustainability over time.

Suppliers and other partners are required, in compliance with applicable laws, to commit to and adhere to integrated waste management systems, even valuing that they adopt production processes that respect social, human and environmental rights.

The acquisition of products must take into account good sustainability practices, protecting and respecting the ecosystem and biodiversity. Production must adopt efficient resources that preserve environmental, animal and human well-being, in order to satisfy present and future needs, without harming the ecosystem and future generations.

In compliance with the law, the company will suspend or end commercial relations with suppliers or partners if it becomes aware that they do not observe the principle of liability for negative environmental impacts resulting from their activities and that they do not act in accordance with the Universal Declaration of Human Rights of the United Nations and with the essential Conventions of the International Labor Organization.

The company supports all initiatives that lead to the prohibition of the existence of activities that restrict free trade, unfair, unfair practices or abuse of negotiating position, operating honestly, in full respect of the agreed contractual conditions, with all its suppliers and partners , and expects the same behavior from them.

► **Competition and Good Commercial Practices**

Violation of these standards and conduct can result in serious consequences for the company and its employees, particularly in terms of reputation, legal costs, fines, disciplinary consequences and public image.

In this regard, the company bases its conduct on the following principles:

- a) **Principle of Competition** – The company believes in an open market and free competition and does not allow any behavior that could be considered anti-competitive, abusive or unfair;
- b) **Principle of Freedom** - The company considers that, in the free markets in which it operates, all participants exercise their right to economic self-determination, including the company, suppliers or customers;
- c) **Principle of Responsibility** – The company establishes as a standard a high level of respect for legal norms that regulate trade and competition, in relations with customers and suppliers, not tolerating or accepting, tacitly or expressly, any conduct that reflects a any complacency towards practices that violate the legal standards applicable to its activity;
- d) **Principle of Satisfaction** – In formulating and expressing its commercial policy and conduct, the company acts independently, always aiming to satisfy its suppliers and customers.

COMMITMENTS OF OUR EMPLOYEES

VGT Portugal considers its employees to be its most valuable asset, remaining committed to ensuring a healthy and pleasant working environment, fair and adequate remuneration, in order to promote motivation for work and a feeling of personal fulfillment. and professional.

However, in order for everyone's motivation and well-being to be achieved, without any discrimination criteria, all employees must ensure compliance with the imposed criteria. Everyone's actions are guided by a high level of moral integrity, loyalty and ethical behavior.

► **Compliance with the Code of Conduct**

Carry out your activities in a professional and honest manner, respecting the set of values, principles, rules and ethical commitments mentioned here and/or described in other regulations of the employer.

► **Responsibilities**

Care for the assigned activities in an honest and cordial manner, carrying out them with the greatest competence. Compliance with ongoing training provided by the organization, with the aim of qualifying your knowledge and skills. Individual initiative must be proactive to achieve collective objectives and implement innovative solutions.

The hierarchical position or the use of delegated power cannot be used abusively, to acquire personal interests or demonstrate superiority over any individual. Anomalies found that violate any organization rules must be reported.

► **Interpersonal Relationship**

The company requires that all its employees perform their activities with dedication, refraining from any action that affects the quality of their duties and performance, as well as that of other employees. Provide an assertive, efficient, respectful and cooperative organizational climate towards all hierarchies, respecting the value of each individual, regardless of their ancestry, gender, sexual orientation, religion, age, marital status, family situation, nationality, ethnic origin, disability, political or ideological beliefs, union membership or any other criteria of a discriminatory nature.

Provide a beneficial team spirit, promoting mutual help and sharing of knowledge and advice, as well as an assertive form of communication, understanding the importance of everyone having a common objective – achieving the organization's goals.

► **Health, Food Safety, Safety and Hygiene at Work**

The health, well-being and safety practices of employees are one of the organization's priority factors, and employees must be aware of and ensure compliance with them. By implementing these practices appropriately, the company provides employees with the best working conditions, so that they feel safe and valued, so that they are an integral part of the development and continuity of good food safety practices. Verification of non-conformities must be transmitted to superiors.

► **Conflict of interest**

Prevent situations of intervention in decision-making processes that involve, directly or indirectly, entities whose collaboration is maintained or was previously maintained, as well as individuals to whom they are or have been linked by ties of kinship or friendship. If it is impossible to comply with this standard, you must notify your superiors.

► **Confidentiality**

Employees must ensure the confidentiality of all information obtained in the performance of their duties, and cannot obtain benefits from it for themselves or third parties.

► **Omissions and Gaps**

No Code can foresee all situations or cover all the needs for clarification or guidance that may arise on a day-to-day basis. It never hurts to appeal to the use of common sense and reinforce that, in case of doubt about the correct compliance with this will, the employee, when faced with a difficult decision, should ask questions first of himself and then, if necessary, of his hierarchical superior or the Ethics Committee.



VGT PORTUGAL
Fresh Vegetables

