

Code of Ethics

Code of Ethics

The Commitment to Doing the Right Thing

We present our Code of Ethics, which defines Grupo Lucci's corporate culture and reflects our decisions and daily actions. Both our values and the Code of Ethics—including the underlying policies and corresponding operating procedures in each management department, related to the Company's sustainability—constitute our commitment to responsible corporate practices.

Our Company was established on the basis of trust, in terms of employment and professional suitability, business strength, transparency and integrity. In addition, compliance with the legal framework regulating the activities constitutes the basis for Grupo Lucci's name and reputation, our companies and Fundación Vicente Lucci.

The principles established in this handbook are basic and necessary for developing healthy relationships among the collaborators as well as good business relations with our suppliers, customers, consultants, competitors and general public. Every time they choose us, they base such choice on our attributes and on their trust in our products.

At Grupo Lucci, we expect our collaborators to perform their tasks in an ethically proper way both inside and outside the Company and regardless of their positions.

Each of us must comply with the legal regulations in force in each country where we interact. We cannot conduct businesses or develop any paid work relations with people or companies involved in illegal or immoral activities.

In addition, we must observe the provisions set forth in the applicable law and Grupo Lucci's internal regulations.

Our Code of Ethics establishes a system of procedures that define the business practice. It gives priority to health and safety, work environment, respect for human rights, and community relations in the management. Moreover, it emphasizes environmental care, communication with the stakeholders, regulatory compliance, and production quality and safety.

We expect our managers, supervisors and leaders to communicate this Code to their work teams and set the example in the daily practice as well as identify, assess and discuss deviations, implementing appropriate controls in order to mitigate risks.

We aim at turning the Code of Ethics into a guide for everyone in case of doubts which may arise when performing their daily activities and in case of specific concerns, and solve them together with the Ethics Committee in order to contribute to our Company's continuous improvement.

The Board of Directors

Code of Ethics

This document lays down the ethical principles governing our business group and guidelines for the Company's behaviour. These standards apply cross-sectionally throughout the value chain of each of our companies. The Code of Ethics is part of Grupo Lucci's Integrity Program and is in accordance with Law No. 27,401 on Criminal Liability of Legal Entities, in force in the Argentine Republic.



Integrity

The Commitment to Doing the Right Thing

Grupo Lucci's Values

Values are the basis for building a virtuous system of growing, orderly and productive workload at Grupo Lucci.

- **Reliability:** we build effective and long-lasting relations for everyone's benefit.
- **Sustainability:** we aim at growing in a stable and responsible manner, managing the economic, social and environmental impact of our businesses.
- **Excellence:** we aim at reaching the highest standards in everything we do.
- **Enthusiasm:** we have a positive attitude and show enthusiasm and dedication in each of our actions.
- **Commitment:** we use our greatest skills to achieve the set goals.
- **Integrity:** there is always consistency in what we say, think and do.

Grupo Lucci's Vision

To be a sustainable agro-industrial group which leads the industry, is known for the reliability of its products and services, and operates in Argentina and in the world.

Ethics Committee

The Ethics Committee aims at:

- Monitoring compliance with this Code,
- acting in case of conflict, and
- establishing penalty mechanisms and action plans in case of non-compliance with the principles set forth in it.

The Ethics Committee is comprised of (1) member of the Board of Directors, Grupo Lucci's CEOs, the HR Manager and the Head of Internal Audit and Compliance.

Reporting Breaches of this Code of Ethics

When a collaborator, regardless of their position or hierarchical level, suspects of or learns about possible breaches of the provisions of this Code, they must report them to the authorized Ethics Hotline and/or the Ethics Committee.

Code Implementation

The Ethics Committee will solve issues related to the Code application or interpretation that cannot be solved by the different hierarchical levels.

When the Ethics Committee suspects of, learns about or confirms a breach of the Code, it will present the situation in order to assess possible courses of action.

In all cases, it will guarantee the utmost discretion and confidentiality of the information received and the right of defence of the collaborators involved.

Our Commitment

The values underpinning our beliefs and guiding our actions enable us to guarantee that the Company's facilities are safe, meet occupational, personal and sanitary needs, and are in accordance with the applicable health and safety regulations.

We are open to dialogue with our employees' representatives, who have been democratically elected, and, in this way, we give our collaborators and different stakeholders the possibility to discuss issues and work together in order to solve them.

We foster a culturally respectful and equal work environment, which is sensitive to the needs of every collaborator and respects diversity.

The Company will impose disciplinary measures that adapt to the nature and circumstances established in the Penalty Policy. If there is a breach on the part of any collaborator during their employment relationship, a relevant penalty will be imposed in accordance with the provisions of the above-mentioned policy and based on the seriousness of the infringement. The Code of Ethics guides our behaviour based on the work we perform inside and outside the Company. Each collaborator will receive a copy of it and will be trained by the HR Department in order to answer any queries they may have. In addition, the collaborators who have just joined the Company will receive a copy of this Code when they start working here. Then, they will have to sign a form acknowledging they have read and understood its provisions. Failure to read or sign the form acknowledging receipt does not exempt them from the terms of this Code. Any violation to the provisions of this Code of Ethics will be considered a violation to Articles 63, and 84 through 89 of the Employment Contract Law in force.

With everyone's respect and collaboration, we will succeed in building trust, which defines us as a responsible company both among our members and in the community.

Our Ethical Principles

Expected Behaviour

The Code of Ethics establishes how we should behave at our workplace every day. This comprises aspects related to:

1. Legality: Each collaborator must be familiar with and observe the laws, regulations and internal and external rules regulating their activity:

- Relevant laws, rules and regulations must be observed.

Avoid any kind of conflict of interest. There is a conflict of interest when private interests are opposed to the Company's interests, that is to say, when there are personal interests that may improperly affect the performance of their duties and responsibilities as a Grupo Lucci's collaborator. Some examples are:

- Providing services to a competitor.

- Being a partner (or a partner's close relative) of a supplier of the Company.

- Participating in a recruitment process where there is a candidate that is personally or commercially related to them.

- Act with integrity and protect the Company's image and reputation, avoiding any legal issue.
- Do not try to bribe or influence any public servant.
- Treat both customers and suppliers equally. Keep a discreet distance in the negotiations and relations with them.
- Do not offer, promise or provide anything to a customer or supplier in exchange for obtaining an improper advantage for the Company and/or yourself.

2. Responsibility: Do not engage in situations, activities or interests that are contrary to your tasks, unless it is properly authorized by the Manager and/or Board of Directors:

- Under no circumstances shall the Company's assets (vehicles, computers, money, products, operating time, computer systems and programs, telephones, wireless communication devices, photocopiers, etc.) be used or misappropriated for personal benefit.
- Do not use the Company's resources for external businesses or any illegal or unethical activities, such as games of chance and pornography, among others.
- Collaborators must safeguard the Company's information that is not publicly available.
- Collaborators must use social media responsibly, especially those related to Grupo Lucci, making it clear that opinions shared in social media are personal and do not reflect the Company's opinions.

3. Transparency: Collaborators must act and express with integrity and honesty. They must always behave properly inside the Company they represent:

- Taking any of the Company's assets, either by stealing them or by taking any Company's product, piece of equipment or information with no authorization may result in their dismissal or a criminal proceeding.
- As well as taking the Company's assets, stealing any collaborators' possessions at the workplace is considered an act of theft.
- Do not falsify any document.

- Do not distort the true purpose of a transaction.
- Do not use the physical space or disturb the Company's good work environment, reputation or assets, including its operating time, to perform any personal activities or bring conflicts.
- Every accounting record and report of the Company must be kept and submitted in accordance with the accounting and tax laws and regulations of each jurisdiction. They must detail the Company's assets and liabilities as well as income and expenses correctly.
- Do not take any personal advantage of an opportunity of financial profit which you have become aware of due to your position in the Company or through the use of a Company's asset or information.

4. Productivity and Professionalism: Collaborators must act with an entrepreneurial mindset, using all their initiative, dynamism and creative capacity, even preventing and anticipating the future. Collaborators must constantly get trained and outdo themselves in their task and in the pursuit of excellence:

- Financial records (of internal activities and external transactions) must be precise. Such records constitute the basis for the Company's decision-making process and for complying with its obligations with its shareholders, employees, customers, suppliers and regulatory agencies.
- Support and develop control, supervision and monitoring activities that foster the observance of business practices which ensure fair competition between the participants of the market where we operate.
- Collaborators must be precise when preparing information for the Company.
- Reports submitted to the regulatory agencies must be complete, precise, clear and they must comply with the required deadlines.
- When estimations are required, they must be backed by appropriate documentation and based on good faith.

5. Respect for Dignity: Collaborators must have a cordial and decent behaviour towards the general public and other Company's collaborators:

- Avoid behaving in a way that is detrimental to the Company's reputation and/or yourself. You are responsible for your actions.
- Take care of your appearance and personal hygiene. Do not encourage other employees to violate the Code, not to report any violation of it and not to cooperate in any investigation of the Code.
- Be honest and treat collaborators, customers, partners, suppliers and consumers in a fair and decent way.
- Collaborators are not allowed to create and/or transmit, by any oral, gestural or written means, expressions damaging or discrediting our Company or our collaborators and directors, as well as other competing companies or their members.
- Any act of discrimination based on age, disabilities, marital status, skin colour, religion, gender, special leaves, sexual orientation, trade union association and political opinion is forbidden when hiring someone or in the work environment at all the Company's departments.
- Collaborators' participation in political and/or voting processes will be completely personal and may not include time investment, financial support or resources belonging to Grupo Lucci. You are not allowed to take a stand on political and/or religious issues on behalf of Grupo Lucci.

6. Confidentiality: Collaborators must safeguard and use information provided by the Company properly, appreciating the trust placed on them for such use. Value and safeguard your own confidential information, respecting other companies' confidential information. In case of queries on how to obtain and use other companies' confidential information, please contact our Ethics Committee.

- Do not disclose confidential information to any person not belonging to the Company, unless you are required to do so for business purposes and once all the appropriate measures have been taken to avoid using information improperly.

- Collaborators who have or may have access to confidential information related to the Company's operations are strictly forbidden to disclose it in any way without express authorization by their Board of Directors.

- They may not use such information to provide consultancy to customers or third parties in general without the appropriate authorization. Under this Code, certain actions require a written authorization by the Board of Directors. In case of queries, do not hesitate to ask your superior.

- Only those people who are authorized by the Board of Directors can provide information concerning Grupo Lucci to the means of communication.

7. Solidarity: The Company encourages collaborators to act towards the internal and external common welfare, to volunteer and take part in social good activities.

- Interact with those organizations that contribute to building a better social, technical and institutional context for the region and the country.

- The Company enables collaborators to learn about the context where production takes place by means of managing volunteer programs since such knowledge enables them to understand our country's culture and idiosyncrasy and its needs.

- Respect our Policies on Sustainability and Good Social Practices.

8. Environmental Respect: Collaborators must care for and respect our environment and natural resources, achieving profitability based on a renewable resource, in a responsible manner and with high energy efficiency.

- The Company has procedures to care for and save resources. Based on the sector, we train and monitor the control of such procedure exhaustively with positive results in terms of saving so that the sector complies with the procedures and does not harm any resource protected by the Company.

- You must care for and respect resources such as paper, light, gas and natural resources, and use them rationally.

9. Respect for Safety: Collaborators must respect every personal protection sign and equipment, necessary to take care of the most valuable resource in the Company: the people's lives.

- We are a smoke-free company. Therefore, smoking is not allowed at Grupo Lucci's facilities. Penalties vary according to where the infringement takes place, whether in the fields or in the industrial plants.

- Based on their positions, collaborators receive their personal protection equipment, and they must wear them permanently.

- Posters show the rules, preventions and prohibitions of risks in the Company. Please, read and observe them.

10. Mutual Benefit: Collaborators must act as a team, permanently looking for the synergy with the rest of the Company in order to maximize efficiency, effectiveness and the functioning economy of their department and the others:

- The management of the Code is everyone's responsibility. If you act with integrity and ask for help in case of queries, you will be doing the right thing.

11. Compliance with Anti-Corruption Laws: We base our business relations on trust, transparency and responsibility. At Grupo Lucci, we comply with all the applicable laws on anti-corruption.

12. Business Integrity: We carry out our businesses in an upright way, in accordance with the applicable laws and regulations, and we do not get involved in any case of bribe, corruption, anti-competitive or fraudulent practices.

13. Gifts: Gifts are strictly forbidden at Grupo Lucci. If any collaborator receives a gift, they must send it to the HR Department so that they decide what it will be used for. In case of event invitations (for example, to a dinner, conference, etc.), they must be directly related to the business and the collaborator's participation must be authorized by each business's CEO.

Ethics Hotline

To communicate with Grupo Lucci, you have an **Ethics Hotline** at your disposal in order to make the Good Social Practices, the Code of Ethics and the Company's Values visible.

You can channel your complaint and/or suggestion through the following means:

1. Website:

<https://ethicshotline.grupolucci.com.ar>

2. Phone: +54 381 4515 500

Extension 5563

**3. Main office: Ruta 302 Km. 7 Cevil Pozo
– Tucumán**

- The channels of communication to make any complaints and/or suggestions will enable you to report, anonymously, any kind of irregularity or offence affecting our business group. Every complaint is dealt with responsibility, monitoring the situation and looking for a solution.

- Your complaints and/or suggestions can be related to our production centers, our administration, our product commercialization, our human and environmental resources, thefts, the disclosure of confidential information, false documentation, embezzlement, unethical behaviour or any other situation you may believe is not suitable inside or outside the Company on behalf of it in accordance with this Code of Ethics.

