



CODE OF ETHICS

APPROVED BY

Plant Manager



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1.0 Introduction

This Code of Ethics presents the principles and values with which Unigrà complies in its business, as well as the behavioural standards, rules of conduct and responsibilities that apply to all entities who enter into a relationship with Unigrà.

This document applies to all Unigrà personnel, regardless of the position and function held including, in addition to all employees, temporary workers, members of corporate bodies and all those who, for whatever reason, provide work or professional services to Unigrà, including occasional. It also applies to its suppliers, customers, corporate partners, temporary business consortia, subcontractors, subsidiaries and/or associated companies.

All internal provisions and procedures must be consistent and compatible with the principles expressed in this document.

This Code of Ethics functions in combination with the Unigrà's Digital Code of Ethics, specifically developed to ensure IT tools provided are used properly and to prevent use that is improper or for illegal purposes.

2.0 General Ethical Principles

This Code of Ethics was developed to guarantee that Unigrà's fundamental ethical principles are explicitly defined and constitute a basic element of the company culture, as well as serving as a behavioural standard for all interested parties.

2.1 Laws and Regulatory Provisions

Unigrà sees compliance with the law and all regulatory provisions as a fundamental commitment and, consequently, promotes knowledge and updates on the same, providing support to all its workers through specific internal departments.

2.2 Honesty

Unigrà requires that its employees and collaborators do not pursue their own or the company's objectives at the expense of compliance with current laws and the ethical principles established in this document. In particular, it is committed to prohibiting behaviour which could create illicit advantages for customers or suppliers, whether public or private.

2.3 Solidarity

Unigrà considers solidarity to be one of its founding principles and an important characteristic in all of its activities. Human relationships are always the basis for every relationship or transaction between economic entities.



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2.4 Impartiality

Unigrà guarantees equal opportunities for all workers and prohibits all types of discrimination at hiring, during training, in wages and in promotions on the basis of geographic origin, gender, religion, sexual orientation, age, union membership, political affiliation and for any other potential discriminatory reason.

2.5 Health and Safety

Unigrà is committed to creating working conditions that protect the psychological and physical wellbeing and health of its workers, respecting their personhood. It is also committed to ensuring the activities carried out on its behalf are based on preventing risks and protecting the health and safety of those providing their labour and that of third parties.

2.6 Human Resources

Unigrà considers human resources a value to be protected and developed, as a tool to achieve knowledge, effectively manage change and acquire new ideas, while also improving productivity and quality and ensuring both individual and company growth.

2.7 Confidentiality

Unigrà guarantees confidentiality for all information regarding its employees, suppliers and clients, unless expressly established in a contract and in compliance with current legal norms. Specifically, Unigrà is committed to processing data and information regarding employees, suppliers and customers in compliance with applicable regulations, including Personal Data Protection Act 2010 (PDPA). All employees and collaborators, in the context of their responsibilities, are required to protect information produced or acquired and to avoid any improper or unauthorised use.

2.8 Environmental Protection

Unigrà, in carrying out its business, is committed to complying with current regulations on environmental protection and ensuring they are complied with Malaysia Environmental Quality Act 1974, carefully guaranteeing that all necessary obligations are met.

2.9 Quality

Unigrà is committed to creating products and services that guarantee the maximum hygienic safety for the food products created, while always maintaining the utmost quality.

2.10 Transparency

Unigrà recognises the fundamental value of accurate, complete and prompt information, guaranteeing all interested parties are informed on activities and results relative to their objectives, completely and exhaustively, using the most appropriate tools.



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2.11 Fair Competition

In its relationships with competing companies, Unigrà adopts behaviours that protect the value of fair competition, refraining from all types of collusion that could possibly compromise it.

2.12 Autonomy and Pluralism

Unigrà always sees pluralism as a value and in its relationships with other organizations or political and social groups it respects varying origins, opinions and culture, while still acting in accordance with its own origins, autonomy and creative capabilities.

3.0 Behavioural Standards and Rules for Implementation

This section of the Code of Ethics outlines behavioural rules which must be adopted by all entities that, in compliance with the ethical principles outlined above, work with Unigrà.

3.1 Company Bodies

3.1.1 Responsibility

In line with that established under current regulations, the company bodies must take inspiration for their actions from the principles contained in this Code of Ethics.

The Chairman and the Directors, in exercising their functions, must act appropriately and transparently to avoid damaging the integrity of the company's assets.

3.1.2 Information and Participation

The Board of Directors must act in accordance with criteria and procedures that guarantee maximum information and participation for all interested subjects, in particular with regards to operations that involve a significant impact on the economic/equity situation and on the company assets.

3.1.3 Autonomy

The actions of the company's bodies must be based on the autonomy and independence of public institutions, private entities, economic associations and political forces.

3.2 Employees Selection

Unigrà, with regards to the company's requirements, selects its personnel solely based on the specific profiles and skills of candidates, without adopting any discriminatory methods. In line with that established in this document, the company establishes the skills it requires and prepares personnel recruitment and selection procedures.



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3.2.1 Hiring

Employees must be hired with regular employment contracts in line with current regulations and the national collective labour contract (CCNL) for the food product industry. At the time of hiring, Unigrà provides detailed and transparent information on the structure of the company and the collective contract which governs the employment relationship, as well as on the company policies on Quality and Safety, Environmental Protection, Worker Health and Safety and Social Responsibility.

3.2.2 Training and Career Development

Unigrà supports the training and development of its employees and their professional growth, based on merit and specific skills. To that end, the company must establish training and development programmes that improve the professional skills and knowledge of its employees.

3.2.3 Organisation

All employees must continually act within the company in a manner which respects the dignity and reputation of everyone, always and in all cases avoiding any abusive or intimidating actions. All employees must base their actions on professionalism, correctness, loyalty and honesty, cooperating with their colleagues and superiors, to achieve company objectives.

Each company department is responsible for the accuracy, authenticity and originality of the documents and information provided in the execution of the activities assigned to them.

The company creates documented procedures that allow all employees to have clear and concrete reference material on the appropriate actions to be adopted and the sanctions established in case of violations. In managing disciplinary proceedings and establishing and applying any sanctions, Unigrà will comply with that established in current regulations and the collective contract, as well as in its internal procedures.

On the occasion of an audit or inspection by relevant public authorities, all company departments must provide the utmost cooperation, without hindering in any way the activities of the inspection or control bodies.

3.2.4 Health and Safety

Unigrà, with the assistance of all interested parties, defines the most appropriate measures to protect the health and safety of all its workers and is committed to ensuring that its workers are aware of all the risks linked to the various activities and the appropriate operating methods, which each worker must respect. To that end, it establishes operating procedures to assess risks, identify the most appropriate preventive measures and implement needed corrective actions, preparing training programmes on the subject for all workers.

3.2.5 Environment

Unigrà determines the most appropriate methods for protecting the environment. In compliance with Malaysia Environmental Quality Act 1974, based on analysis that evaluates significant environmental aspects, includes guidelines for company



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decisions and provides all employees with information on proper operating procedures which everyone must comply with.

3.2.6 Food Hygiene

Unigrà has identified all the measures necessary to prevent problems relative to hygiene during food preparation, which must be carefully applied and complied with by operating personnel throughout the entire production cycle.

To that end, within its Quality Management System Unigrà has developed a Food Safety System that complies with the FSSC 22000 standards, which calls for a Self-Control Manual for each production plant that identifies in detail the critical control points and monitoring and management methods used.

3.2.7 Social Responsibility

Unigrà's policy on social responsibility is seen in this Code of Ethics. Below are the main points contained:

- i. **Forced labour:** The company must not make use of forced or compulsory labour, ensuring that all people who provide their work do so voluntarily.
- ii. **Freedom to select worker's representative:** The company guarantees its workers to have the right to select their worker's representative with the ability to freely meet, to discuss and express any issues/opinions regarding to work life.
- iii. **Health and safety:** The company must guarantee a safe and healthy workplace.
- iv. **Child and adolescent labour:** The company must not make use of labour provided by persons under the age of 16 and those under the age of 18 must not be employed in dangerous environments.
- v. **Wages:** the company must comply with current legislation and the relevant collective contracts with regards to wages.
- vi. **Working hours:** The company must comply with current legislation and relevant collective contracts on working hours and guarantee that, on average, overtime does not exceed 12 hours per week per employee and one day of rest must be guaranteed for each period of 7 consecutive working days.
- vii. **Discrimination:** The company must ensure that workers do not suffer any type of discrimination with regards hiring, payment, access to training, promotion, dismissal or retirement connected to their race, class, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age.
- viii. **Regular employment:** To the full extent possible, the company must make use of regular and long-term employment rather than temporary hiring, which is to be used only under extraordinary circumstances and for short periods.
- ix. **Disciplinary proceedings:** In the cases established under the National Collective Labour Contract (CCNL), the company may begin a disciplinary proceeding. In no case is corporal punishment, sexual abuse, mental or physical coercion or verbal abuse allowed.
- x. **No harsh or inhumane treatment is allowed:** Abuse or reproaches, threats of physical abuse, sexual violence or other verbal abuse or intimidation is prohibited.



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3.2.8 Confidentiality

All employees must keep information they acquire in carrying out their work confidential and duly protected.

Unigrà must ensure that the sensitive information relative to its employees is protected and handled in compliance with current legislative requirements on the subject.

3.2.9 Company Assets

All employees must respect and protect company assets and impede, to the extent possible for them, any improper and/or fraudulent use of the same.

To that end, Unigrà establishes proper behavioural standards that all employees must comply with.

3.2.10 Conflicts of Interest and Prevention of Corruption

No employee must solicit or accept, for themselves or others, intercessions, favourable treatment, gifts or other benefits from entities with whom they enter into a relationship due to their work.

3.3 Suppliers

3.3.1 Selection and Classification

Unigrà is committed to selecting its suppliers and classifying them based on their ability to meet company needs in quality and economic terms and on their commitment to the environment, workplace safety and social responsibility.

To that end, the company prepares methods for classifying and monitoring its suppliers, within the Quality, Environmental and Safety Management Systems and the Social Responsibility System, intended to verify their performance in these areas.

3.3.2 Contracts

Unigrà determines purchase conditions based on evaluations that are as objective, impartial and transparent as possible. Similarly, suppliers must provide the required products/services ensuring compliance with the quality level, delivery time and prices established. In that sense, the company establishes procedures to verify that suppliers comply with contractual requirements and current regulations.

3.3.3 Conflicts of Interest

Unigrà prohibits its employees from receiving money or other benefits from suppliers in exchange for orders, supply contracts or professional services.

3.3.4 Confidentiality

Unigrà is committed to guaranteeing the confidentiality of information regarding its suppliers and at the same time expects that they will not publicly disseminate information acquired through the commercial relationship, in line with current legislative requirements on the subject.



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3.4 Customers

3.4.1 Expectations

Unigrà directs its activities to ensure customer requirements and expectations are met, guiding its organisation towards continuous improvement.

Procedures are established within the company to identify customer requirements and methods for ensuring compliance with Tender Specifications, in order to fully understand the detailed characteristics of the product and/or service to be supplied and the ability to satisfy customer expectations.

3.4.2 Confidentiality

Unigrà establishes procedures to guarantee the confidentiality of the information it acquires through its commercial relationships with customers, in line with current legislative requirements on the subject.

3.4.3 Conflicts of Interest and Prevention of Corruption

In relations with customers, no employee may accept or offer any type of compensation or favourable treatment with the intention of illicitly favouring their own interests or those of Unigrà.

3.5 Public Administration

3.5.1 Relations

Unigrà requires the relevant company departments and/or third parties representing the company to ensure their relations with institutions and the public administration are inspired by the principles of legality, transparency, correctness, confidentiality and active cooperation.

Consequently, Unigrà prohibits all types of corruption or collusion of any kind, which would promote or support business for one's own benefit, for the benefit of the company or the benefit of public administration employees.

3.5.2 Audits

Unigrà prohibits any practices or behaviour by departments responsible for relations with functionaries representing official control bodies (SGS, JAKIM, MOH, DOE, etc) which could affect the activities or results of the same.

3.5.3 Contributions

Unigrà prohibits using contributions, subsidies or financing obtained from the government or another public entity or the European Community for purposes other than those for which they were granted, even if of a modest amount.

The company condemns actions intended to obtain any type of contribution, financing or other disbursement from the government or other public entity through declarations and/or documents which have been altered or falsified for that purpose.



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3.6 Information Bodies

3.6.1 Communication

All Unigrà communications distributed externally, in whatever manner, must be true, clear, accurate and not instrumental.

Relations with information and communication bodies are reserved for the company departments assigned to the same or, in any case, duly authorised.

4.0 Penalty System

Violation of the Behavioural Standards and Principles contained in this Code of Ethics will give rise to penalties in line with the seriousness of the actions taken and damage caused, which in the most extreme cases may also include termination of the employment relationship.