



CODE OF ETHICS AND CONDUCT

H.I.T. Group

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Message from the Executive Director

Dear Colleagues,

The H.I.T. Group, comprised of the following companies: (a) **Kagome Foods Portugal, S.A.**, (b) **F.I.T. – Fomento da Indústria do Tomate, S.A.**; henceforth also referred to as “Company”, intends to transmit to the parties it interacts with, both public and private, and the general public, the principles and values that guide how the Company does business, with a view to developing relationships based on trust and mutual respect. To better cement these relationships, it is necessary to foster high awareness and standards with regard to the ethics of each individual, consolidating the main rules of ethical behaviour that derive from the values and principles that guide us.

The consolidation in the Code of Ethics and Conduct, extrapolated from our values, strengthens our commitment towards the mission entrusted to us, aiming at the continuous improvement of the services we provide.

Therefore, this Code of Ethics and Conduct is built on the founding principles that govern the Company's business, and aims to establish rules of a legal, ethical and deontological nature, which should guide the behaviour of the members of the governing bodies and the entire workforce, thus preventing and fighting against any form of discrimination, harassment and violence in the workplace. This code is therefore a compass that will guide us every day, but especially at the most demanding of times and when doubts arise.

The Company undertakes, whenever necessary, to update its Code of Ethics and Conduct to make sure it is in compliance with the law, and that it duly defends the values of non-discrimination and of combating harassment at the workplace.

Castanheira do Ribatejo, August 28th, 2025

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(CEO)

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SECTION I

Introductory Provisions

Article 1

Purpose and scope

1. This Code of Ethics and Conduct establishes a set of principles, rules and values as regards ethics and professional behaviour that should be complied with by the Company's workforce when doing their job.
2. This Code of Ethics and Conduct applies to the Company's entire workforce, regardless of their contract situation, and all people who provide services in or for the Company, and is therefore also applicable to the members of the Company's governing bodies and other managers in their professional relationships among one another and with third parties.

Article 2

General Principles

1. All work provided to the Company is voluntary. It is expressly forbidden for involuntary, forced or slavery work to take place. All employees are free to leave their job, by communicating their intention to do so in line with the legally established notice period.
2. All employees are entitled to collective negotiation, to form and join unions, in a legitimate and pacific way, and are completely free to do their job without any kind of discrimination.
3. The Company shall provide a safe, clean, healthy and productive working environment. All measures necessary shall be taken to prevent work-related accidents or occupational health problems that might arise, and training about safety in the workplace, including emergency evacuation procedures, shall be administered by a Health and Safety at Work officer.
4. The Company shall not recruit child labour and employees under 18 years of age shall not work at night or in hazardous conditions.
5. All the Company's employees are informed about their salary and all other conditions before they are contracted and during the working relationship, and an itemised wage slip shall be delivered every month.
6. The Company shall pay salaries and provide benefits in accordance with the applicable laws and the collective contract in force, and shall only make deductions from salaries as legally stipulated.
7. The Company forbids the offer, encouragement or acceptance of bribes, whether directly or indirectly, from or to any person.
8. The events and goods that the employees can provide to customers, suppliers or other parties shall be within the limits of good sense. It is expressly forbidden to offer goods or events to public employees.

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9. The Company's operations influence and interfere with the environment. Hence, employees should take the following aspects into account in order to use resources rationally and minimise the environmental impacts caused: (a) reduce waste production; (b) reuse waste generated whenever possible; (c) properly separate the waste in the collection points depending on its category; (d) conserve trees by avoiding the consumption of paper, printing documents only when strictly needed, using both sides of the paper; (e) save water and electricity.
10. The Company is against any kind of discrimination in the workplace, whether it be based on race, age, sex, political opinion, religion, marital status, sexual orientation, handicap, maternity, association or affiliation or any other personal status that is not related to the employee's capacity to perform the job. It is expressly forbidden to carry out or threaten any kind of physical attack, sexual attack or aggression of any other type, namely harassment and verbal abuse or any other form of intimidation.

Article 3

Interpersonal relationships

1. All the Company's employees shall strive to create and maintain a good working environment, namely through mutually cooperative collaboration, by implementing the decisions made by superiors that are taken in line with the Company's policies, or by encouraging and supporting subordinates in their work, without seeking to obtain personal gain at the expense of colleagues.
2. The Company's employees should nurture cordial, respectful and professional relationships with colleagues.
3. All forms of individual discrimination that bring into question the dignity of another human being are forbidden, namely through race, gender, age, sexual orientation, beliefs, marital status, physical disability, political views or opinions, ethnic or social origin or place of birth. These rights are deemed personal identity rights, and any infringement of these rights is punishable by law.
4. The Company shall also promote the freedom of expression and opinion among all its employees. Any censuring or impediment to this human freedom shall be considered an attack on the dignity of a human being and is punishable under the terms of Article 37 of the Constitution of the Portuguese Republic.
5. The rights outlined in the previous points are inalienable, as is the right to information, to inform others and to be informed, and also equal job opportunities.



Definition of Harassment

1. Harassment of a moral or sexual nature or any other abuse of power, under the terms of the current legislation, shall not be tolerated.
2. Harassment is understood as undesirable behaviour specifically based on discrimination as regards recruitment, when working or during training, with the purpose of disturbing or embarrassing the target, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment for them.
3. Sexual harassment is undesirable behaviour of a sexual nature, or other behaviour based on sex, or with sexual connotations, that affects the dignity of the person in the workplace, in a verbal, non-verbal or physical form, with the same purpose or effect as described in the previous point.
4. Moral harassment consists of verbal and/or physical attacks of an offensive or humiliating nature, namely those listed as examples in Annex 1 of this Code of Ethics and Conduct.

Article 5

Perpetrators and victims

1. Harassment can be carried out by any hierarchical superior, by subordinates, by colleagues, or by third parties who interact with the Company.
2. Victims of harassment can be hierarchical subordinates or superiors of the harasser, or peers. The victim is the person who is suffering the acts of harassment.

Article 6

Preventive measures

The Company CEO, or whoever he/she delegates the task to, is responsible for implementing specific initiatives to prevent harassment in the workplace, namely:

- a) Regular consultation with the Company employees, as well as Directors or staff in other management positions;
- b) Check and ensure that internal mechanisms are in place to report irregularities, making sure they are in compliance with the legal regulations as regards confidentiality, information processing and any reprisals for the accusers/reporters;
- c) Provide information and training in the field of harassment and management of disputes in the workplace;
- d) disseminate the Code of Ethics and Conduct among all employees and staff in management positions;
- e) upon recruiting employees, make sure they provide a declaration stating they are aware of the rules of this Code of Ethics and Conduct and accept them.

SECTION II

Internal procedure

Article 7

Reporting improper conduct

1. All the Company employees must report possible cases of improper conduct in line with this Code of Ethics and Conduct, or with the legislation in force, under the terms of the following Clause, without the reporter being subject to any acts of retaliation.
2. For all accusations the confidentiality or anonymity of the accusers and the third parties involved must be guaranteed.
3. Any accusation of improper conduct shall lead to an internal investigation to ascertain the facts, and if proved true, appropriate measures shall be implemented to stop the reported infraction. Therefore, an internal inquiry may be instigated and if justified the infractions shall be reported to the competent external entities.
4. The accuser and the witnesses cannot be subjected to any disciplinary action, unless they are acting deceitfully, based on declarations or facts that come to light in the investigation, whether judicial or non-judicial, which was caused by the alleged harassment until the final ruling, notwithstanding the right to a defence.

Article 8

Procedures in the event of an accusation

1. Any Company employee may present their concerns, confidentially or anonymously, about behaviour that they believe is unethical or does not comply with the Company's Code of Ethics and Conduct.
2. All communications of irregularities must be detailed as thoroughly as possible, identifying the facts that are irregular or are liable to lead to irregularities, namely under what circumstances, when and where they took place, and the identity of the perpetrator(s) and the victim(s), and the means to prove them.
3. Whenever an inquiry is instigated, the investigation of any irregularity that may involve reputational damage for the accused persons shall be carried out in total confidentiality and should be completed swiftly, within the maximum acceptable time limit for a thorough and complete investigation, within the legal limits stipulated in Portuguese Labour Code and other applicable legislation.
4. Any possible irregularity must be reported using the channel available for the purpose at <https://hit.integrityline.com/frontpage> with a guarantee of independence, impartiality, confidentiality, protection of data, secrecy and absence of conflicts of interest by the employees in charge of analysing and processing the accusations, so that the accuser can make the accusation without fear of reprisals.



Article 9

Responsibility and sanctions

1. As mentioned in the previous article, the Company shall instigate a disciplinary procedure under the terms of the Portuguese Labour Code whenever it becomes aware of alleged situations, acts or behaviour liable to indicate harassment in the workplace, notwithstanding any legally punishable responsibility that will give rise to the respective procedures instigated by the competent authorities.
2. The perpetration of harassment shall lead to the application of disciplinary sanctions under the terms stipulated in the Portuguese Labour Code, and the victim may also be entitled to compensation for property or non-property damages, under the terms of Article 28 of the Portuguese Labour Code.
3. The perpetration of harassment is an extremely serious transgression and shall always be subject to the application of an ancillary penalty in addition to the publication of the sentence.

SECTION III

Final stipulations

Article 10

Publicising and Disseminating the Code of Conduct

This Code of Ethics and Conduct shall be publicised by affixing it in the work locations, and it will be disclosed to new recruits, as mentioned in Article 6 (e) of this Code.

Article 11

Publicising and Disseminating the Code of Conduct

This Code of Ethics and Conduct should be reviewed whenever unforeseen facts take place that justify a review.

Article 12

Coming into force

This Code of Ethics and Conduct shall come into force on the date it is publicised and disseminated to all the employees and managers of the Company.



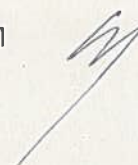
List of examples of moral harassment

1. Work Environment

Denying the targeted person access to information that affects their work performance.
Humiliation or mocking of the targeted person in relation to their work.
Shouting, anger or rage directed at the targeted person.
Pressure on the targeted person not to exercise their legally consecrated rights (e.g. the right to leave owing to illness, holiday time)
Direct or indirect suggestions that the targeted person should leave their job (asking for resignation).
Repeatedly sending to the targeted person unwanted drawings, photographs or images taken from the Internet and of a sexual nature.
Systematic repetition of suggestive observations, jokes or comments about the appearance or sexual condition of the targeted person.
Reception, by the targeted person, of unwanted telephone calls, letters, text messages or emails of a sexual nature.
Intentional and unrequested or excessive physical contact, or unnecessary physical approaches towards the targeted person.
Constantly sending invitations to take part in social or entertainment events when the targeted person has made it clear that the invitations are unwanted.
Invitations and requests for sexual favours from the targeted person, linked to the promise of obtaining work or improving working conditions, job security or one's professional career, in an express and direct manner or in an insinuated manner.

2. Cognitive/emotional requirements

Demanding the undertaking of tasks that are clearly below the targeted person's level of competence.
Withdrawal of main areas of responsibility from the targeted person and replacing them with trivial or meaningless tasks.
Constant repetition to the targeted person of their mistakes or minor failings.
Persistent criticism of the work done, and effort shown by the targeted person.
Systematic request to do tasks that are clearly outside the job description of the targeted person, such as being a "delivery boy".
Assignment of tasks to the targeted person with unrealistic or impossible goals and/or delivery times.
Excessively controlled work.
Attempts to sabotage or find mistakes in the work of the targeted person.
Excessive workload.
Non-assignment of any work to the targeted person, leaving them with absolutely nothing to do.



3. Integration in the Organisation

Transfer to another department against the wishes of the targeted person.
Isolation of the targeted person as regards physical space in relation to their colleagues.
Devaluing the opinions and points of view of the targeted person.
Threat of making life difficult (e.g. overtime or unpleasant tasks or tasks of no interest for the targeted person).
Discarding emails or other attempts to contact by the targeted person.
Vague answers ("maybe yes or maybe no") to requests made by the targeted person.
Reception by the targeted person of insulting and/or offensive telephone calls, written messages or emails.
Devaluing the rights of the targeted person in relation to their gender or age.

4. Interpersonal relationships

The targeted person is the subject of excessively sarcastic and mocking remarks.
The targeted person is the subject of false allegations.
The targeted person is the subject of belittling treatment in relation to their social class.
The targeted person is the subject of insults and/or offensive remarks in relation to their mother tongue, race, ethnic origin, religion or political views.
The targeted person is socially ignored by their colleagues, excluded from the activities of their work group, or ostracised.
The targeted person is the subject of offensive remarks in relation to their private life, habits or social origin.
The targeted person is the subject of intimidating behaviour, such as the invasion of their personal space, "accidental" pushing or blocking of their way.
Propagation of rumours or gossip about the targeted person.
The targeted person is excluded from the organisation's social events.

Source: Checklist: Harassment in the Workplace (ACT – Authority for Working Conditions)

August 28th, 2025