



ROVENSA

— WELL BALANCED AGRICULTURE —

CODE OF CONDUCT

July 2024

00

Index



01

CEO Message

04

02

Introduction

06

03

Mission,Vision & Values

08

04

Our People

10

05

Our Business

13

06

Our Products

16

07

Our Community

18

08

Compliance with the Code of
Conduct

20

09

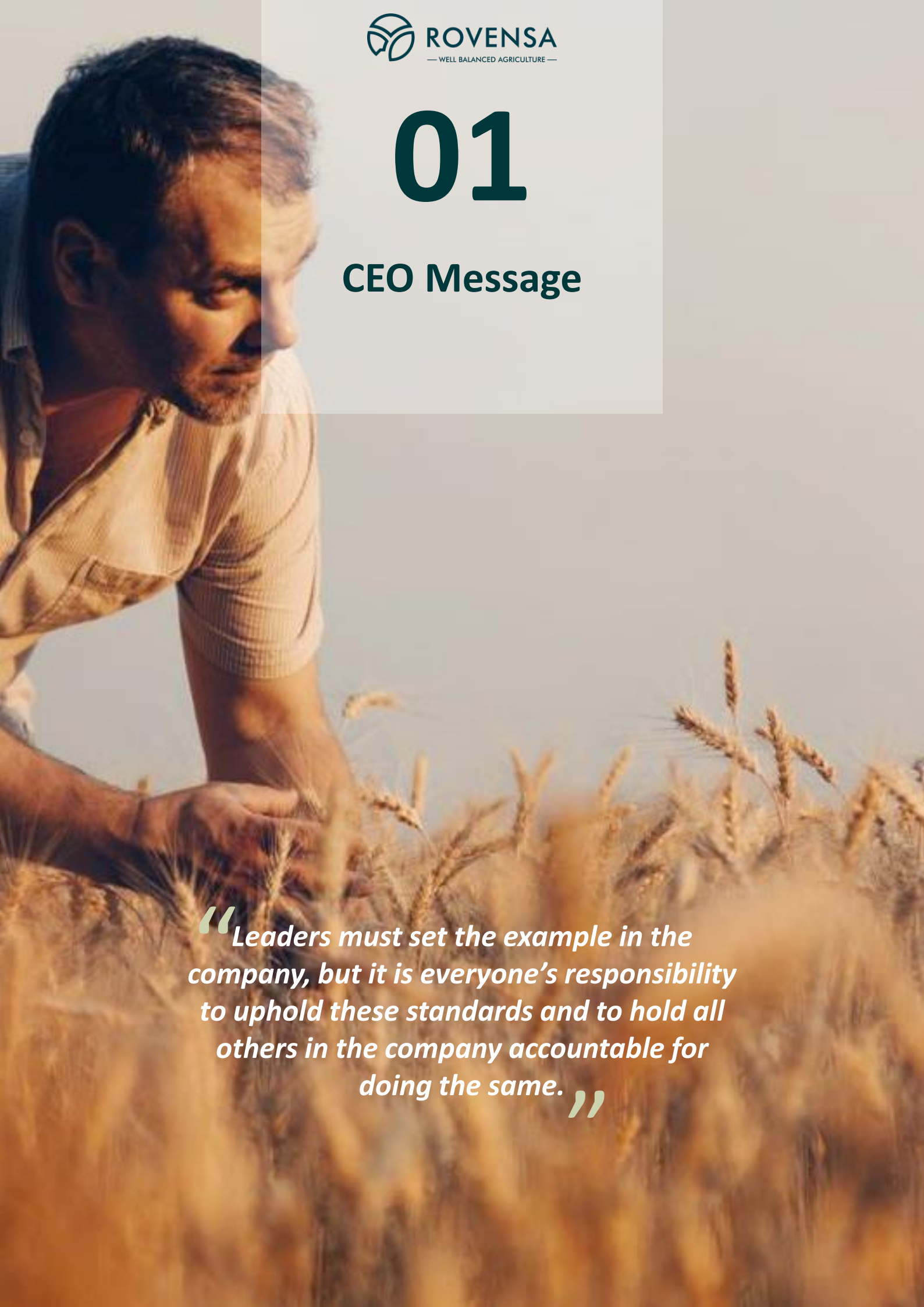
Whistleblowing Contacts

22



01

CEO Message

A man with a beard, wearing a light-colored short-sleeved shirt, is shown from the chest up, looking down at a field of golden wheat. His hands are gently touching the wheat stalks. The background is a soft-focus field of wheat under a clear sky.

“Leaders must set the example in the company, but it is everyone’s responsibility to uphold these standards and to hold all others in the company accountable for doing the same.”



Dear colleagues,

Our mission of feeding the planet through healthy and safe solutions, enabling a balanced and sustainable agriculture, can only be accomplished if we never lose sight of our vision and our values.

This document is intimately linked to our SEEDS values, specifically the value of ETHICS. Our values describe the way we should behave, the attitudes we should display and the principles we should adopt. Ethical behaviour is a value that has been a part of our DNA and it must unquestionably continue to be present as we continue our journey to build Rovensa as a world-wide reference in agriculture.

Our Code of Conduct is the foundation of Rovensa's commitment to uphold an ethical behavior and it summarizes important guidelines and business policies that must define the behaviour of the employees in the dealings with customers, society and all stakeholders as a whole. It will guide us in making the right decisions, so that working as a team, we can all achieve the same high ethical standards.

Leaders must set the example in the company, but it is everyone's responsibility to uphold these standards and to hold all others in the company accountable for doing the same.

Javier Calleja

CEO

02

Introduction

This Code of conduct applies to all employees and third parties of Rovensa Group, including individuals and other entities or companies who supply products or services to Rovensa, clients and other stakeholders with whom we work. Each of these people or entities must accept, comply and honor in a responsible manner the guiding principles and rules set forth.

Together with our Mission, Vision and Values, it should guide our behavior and help us deal with difficult situations and decisions.

This document does not intend to describe every law and internal policy that may apply. Please make sure that you understand the standards of the Code of Conduct as well as the respective local laws and corporate/local company policies, guidelines, rules, procedures and practices.

We expect everyone to raise any questions about the Code of Conduct with their leaders, or with the members of the Human Resources teams, as appropriate.

Violation to this Code of Conduct will result in appropriate action under applicable employment laws and practices of each country.

03

Mission, Vision & Values



“As a Group, we aim to shape the way farmers can do more with less and consumers to have better products every day.”



OUR MISSION

Our mission is to feed the planet, through healthy and safe solutions, enabling a balanced and sustainable agriculture.

We believe that our mission of feeding the planet through a sustainable and healthy agriculture will help the world facing an exponential growth of nutritional challenges, due to overpopulation, climate changes and declining planet resources. As a Group, we aim to shape the way farmers can do more with less and consumers to have better products every day.



OUR VISION

Our vision is to be a world-wide reference, through unique and innovative solutions for plant health & care, leveraging our proximity with local agriculture.



OUR SEEDS VALUES

S
SAFETY

When we embrace a zero-harm culture, we are living up to our responsibility of caring for our own **SAFETY**, our own safety, and the safety of all around us.

E
EMPOWERMENT

When we feel **EMPOWERMENT**, we reveal confidence in ourselves, in the leadership, and in the organization.

E
ETHICS

When we are **ETHICS** we are true to our values and clear about our intentions.

D
DEDICATION

When we show **DEDICATION**, we seek to accomplish our individual mission, knowing that success also depends on us.

S
STRIVING

When we are **STRIVING**, we show boldness, fighting with ambition for what we believe to be the mission and vision of the Group.

04

Our People

“ We value all our employees.
They are our most
valuable asset. ”



LABOR RIGHTS

Rovensa complies with all labor laws, national and international codes and conventions.

We guarantee full labour rights to employees, including freedom to join trade unions and collective bargaining. Working hours will always be aligned with local applicable legislation and practices.

The salary received by each employee will never be under the national minimum wage established, must be fair in accordance with the job held and aligned with the right to equal pay for equal work. Salary must be in accordance with the agreement reached between the parties and will always respect, if such exists, the collective agreement in force.

HEALTH & SAFETY CONDITIONS

Rovensa applies high health and safety standards in the workplace.

We are aware that our employees are our most important asset, therefore Health & Safety is a value that is embedded into our daily activities.

Management is responsible for training, to provide/ensure the conditions and motivating all employees to understand and comply with our Health & Safety regulations and guidelines.

All employees are responsible for following and enforcing company health and safety policies and bring to management's attention any unhealthy or unsafe condition or behaviour.

DISCRIMINATION AND HARRASSMENT

Rovensa commits to maintaining a workplace environment free from discrimination and harassment.

Practices that discriminate based on, race, sexual orientation, political affiliation, disability, religion, age or gender will not be tolerated.

Our workplace must have an environment that is free of attitudes and behaviours that may be considered as harassment, discrimination, intimidation or violence. These or any kind of behaviour, conduct or actions that may create a hostile work environment will not be tolerated.

Rovensa values diversity and fosters a culture that allows each individual to contribute to his fullest potential. All employees must respect equality, diversity and rights inherent to all human beings.



DATA PROTECTION AND CONFIDENTIALITY

Rovensa complies with General Data Protection Regulation (GDPR) and guarantees confidentiality.

We are required, according to the personal data protection law, to protect information, as well as to ensure it is correctly used, guarantee its safekeeping in accordance with legal provisions and ensure the rights of access, rectification, erasure, restriction and objection. Thus, we guarantee the correct use of all employees, suppliers, clients and other stakeholders' data and information.

All personal information that is not in the public domain should be treated as confidential, unless otherwise stated, and may only be used for the purpose for which it was obtained.

05

Our Business

“In conducting our business activities, we always ensure fairness, honesty and integrity are safeguarded. We take our responsibilities very seriously.”



COMPLIANCE WITH LAW

Rovensa complies with all applicable laws, national and international, and industry codes of practice that are applicable to our sector.

We fully support and comply with national and international legislation aimed at creating free and fair global trade. Our production, distribution and marketing of products and services complies with all applicable laws and regulations.

We compete in the market in a fair manner and we prohibit our employees to engage in any unfair or fraudulent conduct or other that may jeopardise free competition between the companies of the sector. All our business practices fully comply with applicable competition laws wherever business is conducted.

MARKETING AND COMMUNICATION

Rovensa conducts its marketing and communication activities ethically and in compliance with all applicable laws.

We are committed to the truth. The Group undertakes to transmit real and relevant information about its products and activities, internally and externally, at all times.

Only authorized employees can represent or communicate externally on behalf of the company. This includes interviews, articles, presentations, conferences and others. When in doubt, please consult the Corporate Communication department. Any request for information about the Group will be forwarded to the communication or marketing department as appropriate.

BRIBERY AND CORRUPTION

Rovensa is strictly against the practice of stakeholders using their relationship with the company to gain a competitive advantage, and vice-versa.

Offers and benefits outside socially acceptable, will not be accepted. If in doubt about this, please consult your line or HR management.

Likewise, employees must not accept nor solicit any gift from any customer, supplier or provider, in cash or in kind, that intends to obtain a favorable decision or outcome and otherwise influence the relationship established with Rovensa.

It is also forbidden to offer gifts, other than socially acceptable, to any customer, supplier or provider with which Rovensa has or is in course of establishing commercial relationships.

Rovensa expects its employees to never take decisions or actions that conflict with the best interests of the Group.

Conflicts of interest arise when the personal interests are in conflict with company interests, hindering the ability to decide or act to the best interest of the Group.

Decisions taken while performing your professional duties will always be impartial and taken in the best interest of Rovensa.

Employees must not undertake any outside affiliations, employment, business activity, investment or formal relationships which would represent a conflict of interest with Rovensa.

When two members of the same family work at Rovensa one must not supervise the other nor be either judge, influencer or advocate in regard to salary, promotion or conditions of employment.

Rovensa reserves the right to reject a job applicant who is closely related to another Group employee. If any similar situation arise, the Group may reassign or transfer the employee.

MONEY LAUNDERING PREVENTION POLICY

Rovensa does not accept any practices related to money laundering.

All transactions must be in line with internal procedures and with applicable legislation. In order to ensure these premises, all People involved must:

- Ensure that all customers have valid identification;
- Keep all records and information pertaining to all transactions;
- Inform customers that all the information they provide may be used to validate their identity;
- Do not accept cash transactions;
- Observe and follow policies of European Union (EU), United Nations (UN), Financial Action Task Force (FATF) or local authorities with particular attention on establishing relations with countries classified of high risk - in order to prevent any situation of money laundering, financing of terrorism.

06

Our Products



“We provide reliable, high-quality products and have safeguards to protect stakeholders and the environment.”

Rovensa ensures the quality of products, which will be supervised and guaranteed at all times.

Our commitment to quality is set in the mission and vision of the Group. We ensure the quality of our products, carrying out a thorough quality control of raw materials, manufacturing processes and the final product.

We work with customers, suppliers and employees to promote the safe and efficient use of its products.

We foster innovation and the use of technology to improve and promote the quality and yield of crops, always caring for the protection of the environment.

INDUSTRIAL AND INTELLECTUAL PROPERTY

Rovensa's industrial and intellectual property (IP) must be protected at all times. Also, Rovensa is committed to respect and protect the IP and Industrial Property of third parties.

We hold permits, licenses, rights, patents, logos, brands and names of the products, formulations, distinctive symbols with which it operates and all that it is legally binded.

The material generated by laboratory work, analysis, studies, agricultural studies and other research activities are exclusive property of the Rovensa Group.

No company employee, should steal or misuse the intellectual property rights owned or maintained by a third party. All and any use of third party intellectual property is strictly forbidden, unless previously authorised in writing by its holder.



07

Our Community



“We strive to make a positive contribution to society in general and specifically to the communities in which we operate.”



COMMUNITIES & STAKEHOLDERS

Rovensa aims to protect the environment, to have an injury and accident-free workplace, and to carry out its operations in a responsible manner caring for and respecting the wellbeing of the community where it operates.

We are committed to protect and preserve the environment and the sustainable use of natural resources, respecting legal requirements in all locations where we operate.

We develop social commitment to the communities in which we operate, and group integration activities, among others, promoting cooperation between employees, suppliers and customers.

We should ensure that all stakeholders act in a manner consistent with our values and code of conduct. In particular we should guarantee that the providers act in an ethical and socially responsible manner and adhere to international standards on human rights (e.g. the European Convention on Human Rights), environmental protection and appropriate working conditions, including the prohibition of child labour.

08

Compliance with the Code of Conduct





COMPLIANCE WITH THE CODE OF CONDUCT

Every employee of Rovensa Group receives this Code of Conduct when they join our Group. Rovensa requires that all people governed by this Code of Conduct understand and fully comply with its provisions. Each employee must follow the Code of Conduct, international and local laws, and all corporate/local company policies, guidelines, rules, procedures and practices.

Employees have the duty to report any known or suspected noncompliance with these matters. Any employee reporting such breaches will be protected of any kind of retaliation

COMPLIANCE CHECK-LIST

When taking a decision or following a directive, each employee should ask himself:

- Is my action compatible with both the spirit and legal aspects of Rovensa 's policy?
- Is my behavior consistent with the ethical and professional standards of Rovensa?
- Does my decision reflect the “right thing to do”?
- Is my decision based on responsible and sound professional judgement?
- Would I feel comfortable to explain my decision, even if this was in public?

09

Whistleblowing Contacts



How can you report a suspect situation?

The Whistleblowing Channel was created to enable the communication of any kind of questions or suspected transgression of the Code of Conduct.

A group of professionals, impartial and external to the company will record all situations, and investigate them, if necessary. This channel is managed by WhistlerBlower Security, an external company, which in addition to the responsibility of receiving reports through a multiple channels, will ensure anonymity, if requested by the employee.

If any further action is required this company will inform the Ethics Committee to follow up on the process, which may involve the need for investigation, archiving and/or will determine other procedures to be followed.

The Ethics Committee is an internal board designated by the Group's Executive Committee, whose members are Virginia Guerrero Santo-Tomas, Mónica Ramos and Pedro Gaio.

Please consult detailed information about the procedures and contacts of this whistleblowing channel on our intranet.