



Integrity Program

This Integrity Program, made up of a Code of Ethics, Anti-Corruption Policy and Conflict of Interest Policy, is the result of a prior risk assessment prepared by Fábrica de Alimentos Santa Clara S.A. to comply with the provisions of National Law No. 27.401. The codes and policies are transcribed below, together with their respective statements of commitment for all employees of our Company.

CODE OF ETHICS

Objective

The objective of this code is to establish the basic principles to which the behavior of the employees of Fábrica de Alimentos Santa Clara S.A. (the "Company" or "Santa Clara") must conform. It is the Company's intention to ensure that they act honestly, in accordance with good business customs and practices, under the terms of National Law No. 27.401.

Scope

This code applies to all employees of Santa Clara, including employees, executives, directors, representatives and agents, regardless of the position or function exercised, who guide the planning and execution of their tasks or tasks in such a way as to prevent the commission of the crimes contemplated in Law 27,401, who are obliged to know and comply with it at all times.

Basic principles

The organization's employees must abide by the following basic principles:

- **Respect for legality:** employees must comply with applicable laws and regulations in their actions both within the organization and outside it, especially to prevent the illicit acts listed in Law 27,401.
- **Integrity:** Employees must base their actions on the values of integrity and honesty and avoid all forms of corruption, both in the private corporate sphere and in the field of tenders and bidding processes, in the execution of administrative contracts or in any other interaction with the public sector.
- **Respect for human rights:** Employees must maintain scrupulous respect for the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights and in the Constitution of the Argentine Nation.

Responsibilities

The collaborators:

- They must adhere to the principles and requirements contained in this Code and ensure that other partners in the organization do so as well.
- They must understand and apply the policies, procedures and requirements that are applicable to the exercise of their functions.
- They must notify their superiors or through the communication channel established for this purpose of their knowledge or well-founded suspicion of a breach of this Code.

Overall Commitment

All Santa Clara employees are committed to acting ethically and honestly, to respect the rules and to behave with integrity. They undertake to respect all policies and regulations that the company establishes to govern their conduct, as well as all national or local regulations related to transparency in public procurement.

Commitments

Both Santa Clara and its collaborators assume the following commitments:

- **Respect:** the Company's treatment of its employees, of them among themselves, and of third parties, must be within a framework of respect. Any form of discrimination, unfair treatment, or any conduct that is abusive, hostile, or offensive will not be tolerated.

SC. PO. ADM-01 Rev. 02

Review Date: 03/2025

- **Equal opportunities:** all employees will have equal opportunities for the development of their professional career. To this end, promotional decisions will always be based on assessments of an objective nature, based on the principle of merit; and, in turn, they will be given the possibility of personal and professional training through training. All employees must promote and respect the professional development of their colleagues.
- **Occupational health and safety:** the Company will provide its employees with a safe and healthy environment for their work; updating occupational risk prevention measures and respecting applicable regulations. Employees are responsible for observing compliance with health and safety regulations to protect themselves and other employees and/or third parties.
- **Respect for privacy:** collaborators will be asked only for those data that are necessary for effective management or for compliance with applicable regulations; and confidentiality will be maintained with respect to them. Those employees who have access to information from other collaborators will respect and promote its confidentiality and will make responsible and professional use of it.
- **Fair competition:** any conduct that involves the exercise of illegal unfair competition practices or that impedes compliance with competition laws or transparency laws in public procurement is prohibited.
- **Veracity of books and records:** corporate and accounting books and records must be accurate and truthful. The making of false or incomplete registrations, their omission, or any other action tending to adulterate them is prohibited.

Commitments to third parties

- **Quality:** Santa Clara establishes as a guideline of its business the search for the quality of its products; always seeking to meet the expectations of its customers and anticipate their needs.
- **Confidentiality:** The Company guarantees respect for the confidentiality and privacy of the data of third parties in its possession. Its employees undertake to use the information only for what is necessary for the proper management of the business and to respect its confidentiality.
- **Transparency:** the Company and its collaborators will base their relations with third parties on the principles of integrity, professionalism and transparency. At the same time, it undertakes to transmit truthful, complete information that expresses the true image of the company, its business activities and its business strategies.
- **Environment:** the Company will seek to respect the environment in which it carries out its activities, seeking to minimize the negative effects that they may have. To this end, it should make available to its employees the means that are necessary and should instruct them in the use of them.
- **Social commitment:** Santa Clara will act in a socially responsible manner, respecting the environment, culture and customs of the people affected by its activities.

Periodic risk analysis

Although this Code is the result of an exhaustive risk analysis, it will be the responsibility of the compliance officer designated by the Board of Directors of Santa Clara to periodically update said analysis under the terms of the provisions of Law 27,401.

Regular training

It is the responsibility of the compliance officer to take the necessary measures so that all Santa Clara employees are informed and updated on the provisions of the Company's Integrity Program. To this end, it may arrange meetings and/or informative talks, to train employees on the ethical line and anti-corruption policies that Santa Clara follows.

Breaches

Failure to comply with this Code is subject to the corresponding sanctions according to the case.

Statement of Commitment

I declare that I have read and understood the Code of Ethics of Fábrica de Alimentos Santa Clara S.A., adhere to its content, and assume the commitment to comply with it in all my activities in the Company.

ANTI-CORRUPTION POLICY

Objective

The objective of this policy is to project to all employees of Fábrica de Alimentos Santa Clara S.A. (hereinafter the "Company" or "Santa Clara"), in accordance with the provisions of Law 27,401, a clear message of the fight against corruption in all its forms and thus prevent its development in any of the activities carried out.

For this, it is necessary to develop a business culture that promotes ethics and honesty, as well as the establishment of a system that allows evaluating and eventually sanctioning those behaviors that are (effectively or potentially) corrupt. In this way, the aim is to prevent criminal conduct and thus avoid the commission of unlawful acts in and/or by the Company.

Scope

This policy applies to all employees of Santa Clara, including employees, executives, directors, representatives and agents, regardless of the position or function exercised, who guide the planning and execution of their tasks or tasks in such a way as to prevent the commission of the crimes contemplated in Law 27,401, who are obliged to know and comply with it at all times. as well as to report non-compliance through the channels available for this purpose.

Internal rules

Prohibitions

Santa Clara employees must avoid any improper or inappropriate-looking conduct. Specifically, they must make decisions based on legitimate commercial factors (such as price and quality); they should not be influenced by any type of payment or consideration, or by the possibility of obtaining a personal benefit.

In this regard, it is prohibited:

- ***Offering, promising, giving, or receiving gifts and favors for the purpose of influencing decisions affecting the Company or for personal gain:*** This prohibition does not imply that gifts or courtesies may not be given or received, but it does mean that they must be reasonable within normal business practices. For this, it is necessary that both its value and its frequency are reasonable; and that in no way can they be perceived as a bribe or prize. Consequently, it is forbidden to give or receive gifts in money or equivalent.
- ***Offering or receiving any type of entertainment with the aim of influencing decisions that affect the Company or obtaining personal benefit:*** as in the previous case, the prohibition is for those cases that are outside normal business practices, or that can be understood as a bribe or prize. If entertainment of this nature is offered, employees must give notice of this.
- ***Offering or receiving hospitality benefits for the purpose of influencing decisions affecting the Company or for personal gain:*** Hospitality benefits are those expenses that are incurred as care for people who do not belong to the organization to promote relations with them or to promote products or services for legitimate business purposes. They include, but are not limited to, expenses for meals, entertainment, transportation, and lodging. Despite being a common (and even desirable) practice in business, its misuse should not be permitted. Consequently, the offer or receipt of hospitality benefits that are not modest and reasonable are prohibited, and the following rules are established for the granting of such benefits:
 - The choice of the people who receive these benefits is the responsibility of the organization or company in which they work, and not of the collaborators of our Company.
 - Santa Clara bears only the expenses necessary to achieve legitimate business purposes; excluding those expenses that exceed what was agreed.

SC. PO. ADM-01 Rev. 02

Review Date: 03/2025

- **Offering social contributions on behalf of the Company, without the Company's approval:** No employee may offer, make or commit to any contribution, donation or social responsibility project in exchange for any benefit, even if it is related to the Company's commercial interests. If you have this intention, you must go to the Santa Clara management so that it can decide how to proceed. To this end, the identity and reputation of the alleged beneficiary, and their activities and links, must be investigated, to ensure that these operations do not facilitate money laundering or any other type of illegal activity, especially under the terms of Law 27,401.

- **Offering or receiving any other type of benefit that could be interpreted as a bribe:** this is understood as the delivery or promise of anything of value provided directly or indirectly to people who may have an impact on the Company's activities. Cases of bribery corresponding to the Company's activity in the field of tenders and bidding processes, in the execution of administrative contracts or in any other interaction with the public sector will be punished more severely.

In turn, any form of corruption, extortion or fraud is prohibited; falsifying documents, expense reports, financial records, brands or products; misappropriation, smuggling, forgery, business espionage, disclosure of secrets or other unfair and anti-competitive practices. And, with respect to accounting controls, it is prohibited:

- Making false, misleading, or incomplete postings
- Establishing funds or accounts that are not disclosed or recorded
- Posting expenses of collaborators that do not have their corresponding receipt (valid receipts or invoices)
- Accepting and/or posting false records, receipts, or invoices

Administrative and financial controls

Employees must ensure that all accounting and financial transactions are properly managed and recorded correctly, completely and in a timely manner. To this end, they must:

- Prevent the same person who initiates the processing of a certain payment from being the same one who must approve it.
- Maintain and ensure that the corresponding payment authorizations are obtained (so that the larger the transaction, the greater the hierarchy of who must approve the payment).
- Verify that the appointment and the work entrusted to any external collaborator have been approved in accordance with the mechanisms implemented by the Company.
- Request and maintain the supporting documentation for each approval obtained in relation to payments.
- Restrict the use of cash payments and implement efficient controls where cash payments are essential.
- Request that descriptions included in invoices and any other business documents be clear and accurately reflect the supply or service agreement entered by the parties.

It's a duty to communicate. Internal whistleblowing channel. Protection of whistleblowers.

Any employee who has knowledge or suspicion of the actual or imminent occurrence of any violation of this policy must report it to their hierarchical superior and/or the compliance officer designated for this purpose. The complaint can be made under any modality, and its confidentiality will be respected, in accordance with the provisions of Law 27.401. The possibility is enabled for a third party to make the complaint under the modality that it deems appropriate, which must preferably be before the Board of Directors of Santa Clara or the designated compliance officer.

Intolerance of retaliation

Santa Clara will not tolerate any act of retaliation or sanction against anyone who makes a complaint or refuses to commit corrupt acts.

Rules regarding third parties

Before contracting with third parties, an analysis must be carried out regarding their integrity, which must be proportional to the risk of potential corrupt activities, both in the private corporate framework and in that of public procurement. In the same sense, subsequent monitoring of their activities must be carried out.

Due Diligence Process

Before contracting with third parties, or in the case of participation in merger or acquisition processes, the following steps must be complied with in terms of prevention and transparency:

1. Meetings and interviews.

Employ and deal only with qualified people (individuals or entities) by identifying their suitability and legitimate business reasons for choosing them, interviewing and meeting with the candidate or their representatives, and reasonably investigating reputation, credentials, and experience. The key stages of the research carried out must be documented.

2. Compilation of General Information.

The compliance officer may determine which sources of public or private information should be consulted as part of the verification process.

In all cases in which an external collaborator is going to operate in a country or territory with a considerable level of corruption according to international standards, the potential hiring must be examined by the compliance officer and/or by the Internal Audit area.

Whenever an alert sign of irregularities is identified, prior to concluding the investigation with respect to it and/or prior to carrying out any agreement with a third party, and/or during the execution of the existing agreement, the collaborator proposing the appointment must contact the compliance officer so that a final analysis can be carried out and a resolution can be adopted in this regard.

3. Documented Information

Tasks completed should be documented and kept as part of the verification process.

Periodic risk analysis

Although these policies are the result of an exhaustive risk analysis, the compliance officer designated by the Board of Directors of Santa Clara will oversee the periodic update of said analysis under the terms of the provisions of Law 27,401.

Regular training

It is the responsibility of the compliance officer to take the necessary measures so that all Santa Clara employees are informed and updated on the provisions of the Company's Integrity Program. To this end, it may arrange meetings and/or informative talks, to train employees on the ethical line and anti-corruption policies that Santa Clara follows.

Breaches

Any person who does not comply with the provisions of this policy will be sanctioned. Some examples of the sanctions that the offender can receive are fines, suspensions and even dismissal, without prejudice against the provision of the background of the case to the competent justice, if the violation of any legal rule is verified.

Statement of Commitment

I declare that I have read and understood the Anti-Corruption Policy of Fábrica de Alimentos Santa Clara S.A., adhere to its content, and assume the commitment to comply with it in all my activities in the Company.

SC. PO. ADM-01 Rev. 02

Review Date: 03/2025

CONFLICT OF INTEREST POLICY

Objective

The objective of this policy is to ensure that the decisions made at Fábrica de Alimentos Santa Clara S.A. (hereinafter the "Company" or "Santa Clara") are made with impartiality, transparency and integrity; ensuring that the interests of the Company always come before private interests. To this end, it establishes guidelines for the management of situations that may represent or be understood as a conflict of interest among employees.

Scope

This policy applies to all Santa Clara employees, including employees, executives, directors, representatives and agents, regardless of the position or function exercised, who guide the planning and execution of their tasks or tasks in such a way as to prevent the commission of the crimes contemplated in Law 27,401, who are obliged to always know and comply with it.

Rule

All employees of the Company have the duty and responsibility to know and communicate about any situation where their personal interests influence or may influence decisions or aspects related to Santa Clara's operations.

As a rule, there will be a conflict of interest whenever there are direct or indirect interests and/or links up to the second degree of consanguinity, with suppliers, competitors or customers.

General rules

- All contributors must read and commit to this policy.
- All collaborators, at the time of their employment, must notify them of conflicts of interest, and update said notification whenever there are changes or situations of conflict of interest; as well as when there are changes in work assignments.
- Employees must report any real or potential conflict of interest, warning their immediate superiors or, if this is not possible due to matters of relevance or urgency, managers or the controller.
- Both the notification of the conflict of interest and the response to it must be recorded in writing.
- The decision regarding how to act in the event of a conflict of interest will always be made by the Company, not by the employee.
- No contributor is permitted to make use of the Company's information for purposes other than those for which it was issued, nor to disclose it to third parties; both during and after the end of their relationship with the Company.
- Failure to comply with this policy will be sanctioned by Santa Clara in the manner deemed most appropriate to the case, and may consist of fines, suspensions, dismissals, etc.

Specific rules

The collaborators:

- They cannot have working ties with suppliers, customers or competitors.
- They cannot have an economic interest in Santa Clara's operations or business.
- They must declare upon their entry any participation in companies of suppliers, customers or competitors.
- They may not receive income directly or indirectly from the lease of furniture or real estate related to the Company's business.
- They should avoid acquiring the company's products outside of conventional commercial channels, requiring special authorization if necessary.
- They must report as a conflict of interest the direct or indirect participation in businesses related to the sector to which Santa Clara corresponds and/or to the activity they carry out in it.

SC. PO. ADM-01 Rev. 02

Review Date: 03/2025

- They may not grant or approve donations, sponsorships, and gifts on behalf of the Company. The default approval channels must be followed.
- They cannot accept or give gifts that could be understood as bribes or insinuations, especially to public officials. If they are offered, they must report the case through one of the defined reporting lines.
- They must inform the Company of their connection to judicial investigations of any kind.
- They cannot make a profit or avoid personal financial losses at the expense of the organization or its customers.
- They cannot avoid contracting with suppliers or customers based on personal prejudices.
- They cannot use their position to influence seeking personal, friendship or family benefits.
- They may not use Santa Clara's facilities and equipment for personal gain or that of family or friends.
- They cannot anticipate economic recognition by manipulating or concealing relevant information.
- They cannot compromise the fulfillment of objectives of other areas of Santa Clara to meet individual indicators, goals or results.
- They may not conduct business with persons whose ethical, social and business behavior is known to be contrary to the law, ethics and good customs, especially if that person has been involved in any of the crimes listed in the first article of Law 27,401.
- They cannot carry out political activities within the company.

Periodic risk analysis

Although these policies are the result of an exhaustive risk analysis, the compliance officer designated by the Board of Directors of Santa Clara will oversee the periodic update of said analysis under the terms of the provisions of Law 27,401.

Regular training

It is the responsibility of the compliance officer to take the necessary measures so that all Santa Clara employees are informed and updated on the provisions of the Company's Integrity Program. To this end, it may arrange meetings and/or informative talks, to train employees on the ethical line and anti-corruption policies that Santa Clara follows.

Statement of Commitment

I declare that I have read and understood the Conflict-of-Interest Policy of Fábrica de Alimentos Santa Clara S.A., adhere to its contents, and assume the commitment to comply with it in all my activities in the Company.

"Compliance with this Integrity Program is the responsibility and responsibility of the Integrity Program commitment of all of us who make up the Company".

Fernando Spárvoli
Manager