



CODE OF ETHICS
-CAN AM FRESH MEXICO, S. DE R.L. DE C.V.-

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I. TRACK OF CHANCES

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01		First Edition	New	[T.J. Bauer]	[Jammie Underhill]

II. MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

Dear CAN AM FRESH MEXICO, S. DE R.L. DE C.V. team:

Our company, since its foundation, has been characterized by the values that govern its daily activities, in strict compliance with the national and international legal framework. The above to contribute to the common welfare of our shareholders, employees of any type and hierarchical level, representatives, administrative personnel, customers, suppliers, contractors, other companies and commercial associations, the financial community, civil society, local communities, and indigenous and Afro-Mexican communities, national and international institutions, the media and the organizations and institutions that represent them.

In our company, our employees and any individual directly or indirectly related are a fundamental part of achieving our goals and complying with our legal and ethical obligations. Therefore, to constantly improve, we encourage everyone related to the value chain to know and implement the provisions of the Code of Ethics.

This Code of Ethics is the foundation document that governs the behavior and actions of those of us who are directly or indirectly related to the company. It is mandatory for all of us: me, the members of our Board of Directors, collaborators, employees, and any third party related to the company's value chain.

Those who know of any violation of the provisions established in the Code of Ethics, whether it is a particular action or an inappropriate practice, must report it through the reporting channels designated for this purpose. The above, with total confidence and certainty that there will be no retaliation, since we will implement all necessary measures to preserve the privacy, integrity, and security of anyone who contributes to maintaining legality within our company.

Remember that you are a reflection of the values of our company, and you represent us before society.

Sincerely, [Jammie Underhill].

III. PURPOSE OF THE CODE OF ETHICS

At CAN AM FRESH MEXICO, S. DE R.L. DE C.V. (the "Company"), we strongly believe in the need to act ethically and professionally to contribute to the success of our shareholders, members of the board of directors, employees, customers, suppliers, business partners, social groups with which we interact and, in general, any individual, legal entity or community directly or indirectly related to the value chain of the Company (the "Stakeholders").

The purpose of the Company's Code of Ethics (the "Code of Ethics") is to establish the guidelines that must govern the actions of all individuals directly or indirectly related to the Company in order to comply with the Company's values and ethical principles.

Furthermore, through the Code of Ethics, the Company consolidates the ethical principles that govern the operation, activities, and public and private relations of the Company, as well as the compliance with and promotion of the Human Rights Policy of [Can Am Pepper Company LTD.] and its subsidiaries (the "HR Policy").

IV. SCOPE OF THE CODE OF ETHICS

The Code of Ethics, and the internal regulations implementing it, apply to all Stakeholders and, in general, those who act on behalf and/or in the representation of the Company. The Company is committed to establishing a due diligence process to maintain business relationships that share the values and ethical principles described in the Code of Ethics.

The Company reserves the right to terminate the contractual relationships with any of the subjects referred to in the immediately preceding paragraph in case of violation of the provisions set forth in the Code of Ethics.

The content and implementation of the Code of Ethics shall under no circumstances be contrary to national and international regulations. In case of inconsistencies, the content of the Code of Ethics shall be amended immediately.

V. RESPONSIBILITIES

1. Board of Directors
 - a) Ensure compliance with the Anti-Corruption Policy.
 - b) Demonstrate leadership and commitment to the Company's Compliance Program.

- c) Provide the financial, material, and human resources for the effective implementation of the Company's Compliance Program.
- d) Designate the Compliance Officer to supervise the operation and implementation of the Company's Compliance Program.
- e) In case of non-compliance with the Anti-Corruption Policy and other internal provisions of the Company, determine the sanctions applicable to internal personnel and/or third parties, as appropriate.
- f) Authorize donations to duly registered associations.

2. Compliance Officer

- a) Implement and supervise compliance with the Anti-Corruption Policy.
- b) Periodically verify the implementation and effectiveness of the Anti-Corruption Policy and the other policies of the Company's Compliance Program.
- c) Continuously train employees on the content of the Anti-Corruption Policy.
- d) Address doubts, clarifications and/or comments related to the content, scope, and implications of the Anti-Corruption Policy.
- e) In case of potential non-compliance with the Anti-Corruption Policy and other internal provisions of the Company, initiate the corresponding internal investigation in accordance with established protocols.
- f) Keep confidentiality and safeguard the information derived from the internal investigations carried out.
- g) Prepare a report on the results obtained in internal investigations and submit it to the Board of Directors.
- h) Immediately report to the Board of Directors the need to investigate and verify facts, suspicious conduct, or matters related to the Company's Compliance Program and residual risks.

3. Department of Human Resources

- a) Promptly follow up on compliance with the Code of Ethics.
- b) Carry out and supervise due diligence processes during the contracting process.

4. Internal personnel/ Third parties

- a) Comply with the Code of Ethics.
- b) Report any act or omission that contravenes the provisions of the Code of Ethics and other internal regulations of the Company.

VI. PRINCIPLES AND VALUES

1. Organizational Culture

1.1 Mission

Being a sustainable, leading and innovative company dedicated to the elaboration, transformation, development, manufacturing, storage, purchase, sale, marketing, distribution, import and export of all types of vegetables and fruits, as well as all types of packaged food and beverages, wholesale or retail, in compliance with the applicable regulations and in full respect for the human rights of the people involved in the value chain.

1.2 Vision

Convert the Company into the best in the market to generate welfare and profitable growth, contributing to the progress of present and future generations.

1.3 Values

- a) **Passion:** maximize the effort to obtain results.
- b) **Communication:** speak with respect, assertiveness, and openness.
- c) **Creativity:** seek and implement innovative and efficient strategies to obtain results.
- d) **Results orientation:** to fulfill - and go beyond - the objectives established by the Company.

2. Standards of Conduct

2.1 Ethical Principles

Stakeholders' actions shall be governed at all times by the following principles:

- a) **Honesty:** acting with transparency and according to the law, morality, and good customs. The actions of all individuals directly or indirectly related to the Company shall reflect the Company's values. The following behaviors, among others, shall be considered an exercise of transparency and sincerity:
- ✓ Always telling the truth regarding the development of the daily activities of each collaborator within the Company.
 - ✓ Acknowledging mistakes and immediately informing the direct manager. In case of doubts about who your direct manager is, please contact the Human Resources Department.
 - ✓ Speak clearly about negative situations and areas for improvement.
 - ✓ Avoid any action that may be harmful to anyone connected with the Company or the Company itself.
 - ✓ Act fairly toward subordinates.
 - ✓ Clearly and truthfully report all expenses incurred for work-related reasons.
 - ✓ Diligently report work-related expenses to the accounting department.
- b) **Respect:** to be thoughtful, tolerant, and empathetic with those who directly or indirectly are related to the Company.

We believe that maintaining diversity concerning the background, style, experience, identity, and opinions of our employees helps us to be a better Company. The Company will not tolerate discrimination or harassment based on the following characteristics of an individual, among others:

- × Race.
- × Color.
- × Ancestry.
- × Ethnicity.
- × Religion.
- × Sex.
- × Pregnancy.
- × Nationality.
- × Age.
- × Disability.
- × Marital Status.
- × Veteran Status.
- × Military status.

- × Genetic information.
 - × Sexual Orientation.
 - × Gender Identity or Gender Expression.
- c) **Responsibility:** both the Company's internal personnel and third parties who interact with the Company must act responsibly at all times. The following are examples of conduct that constitute responsible behavior:
- ✓ Comply with the working hours agreed with the direct boss or established in the labor agreement.
 - ✓ Respect and implement the established processes, as applicable to internal personnel, to perform their activities.
 - ✓ Comply with the obligations corresponding to the position they hold.
 - ✓ Attend daily activities, team meetings, training and/or meetings on time.
 - ✓ Diligently use the resources provided by the company to avoid, as far as possible, their deterioration.
 - ✓ Know the contents of the Code of Ethics and other policies of the Company's Compliance Program.
- d) **Equality:** to provide equal treatment to all individuals directly or indirectly related to the Company. Some of the conducts considered to provide equal treatment are, among others, the following:
- ✓ Accept differences of gender, ethnicity, socioeconomic status, sexual preference, and religion, among others.
 - ✓ Listen respectfully to the different opinions of individuals, and not disqualify them for being different from your own, or because of race, sex and / or any other issue of this nature.
 - ✓ Treat all individuals equally, regardless of hierarchical position or activities performed.
 - ✓ Not to use discriminatory language.
 - ✓ Recognize the value of the people involved in the work community, regardless of their beliefs.
 - ✓ Respect the exercise of the rights of each person.
- e) **Commitment:** to fully comply with the responsibilities assumed with the Company and with third parties, in accordance with the principles and values that govern the Company.

Being committed implies dedication and willingness to achieve goals beyond what is expected. The following behaviors, among others, are considered to reflect commitment to the Company:

- ✓ Be informed about the generalities and particularities of the work you perform within the Company.
 - ✓ Promote healthy communication to generate an environment of trust and openness in the Company.
 - ✓ Be aware of the importance of teamwork.
 - ✓ Knowing and complying with the Company's organizational culture.
 - ✓ Comply with the established agreements responsibly and honestly.
 - ✓ Transmitting a positive and enthusiastic attitude to ensure quality service and satisfaction.
 - ✓ Encourage individual and group development, contributing to achieving personal and professional growth toward excellence.
- f) **Loyalty:** compliance with commitments, especially in adverse circumstances. It implies acting based on the Company's principles. Among others, the following are considered loyal conduct:
- ✓ Finding solutions to carry out activities with dedication and passion, especially in adverse or difficult circumstances.
 - ✓ Having a commitment to oneself and to the Company to improve every day in the activities to be performed.
 - ✓ Actively participating in events and activities within the Company.
 - ✓ Protecting the Company's information, thus it is forbidden any improper use of such information.
 - ✓ Building good working relationships with all Company's employees to achieve the consolidation of a healthy working community.
 - ✓ Avoid any activities that may damage the Company's reputation.

2.2 Relationship between employees

The Company's most important asset is its employees. Therefore, we seek to consolidate a work environment of respect, honesty, empathy and recognition. Having a healthy and supportive environment makes it easier to meet personal and work goals and motivates those who are part of the Company to optimally perform daily activities for the benefit of the community.

The Company protects the Human Rights of all its employees and guarantees equal treatment, regardless of race, ethnic origin, economic status, social status, sexual orientation, gender expression or identity, physical or health condition, religion, or other similar matter.

Therefore, disrespect, discriminatory behavior, quarrels, arguments, or fights between employees, etc., are strictly prohibited. Employees shall, at all times, conduct themselves with respect, professionalism, and kindness toward other individuals directly or indirectly related to the Company.

The Company strictly prohibits any workplace violence against the Stakeholders' Human Rights.

The Company respects the rights of internal personnel to join a union and to freedom of expression. However, the Company does not respond to any ideology and have no political affiliation, so we encourage employees to indicate that their political opinions are only in a personal capacity and not on behalf of the Company.

Finally, employees are prohibited from conducting or promoting a personal business on Company premises.

2.3 Conflict of Interest

Employees must avoid situations that may affect their professional and ethical judgment and favor third parties, with the idea of obtaining a personal benefit, without objectively analyzing the advantages or disadvantages caused to the Company.

Employees are prohibited from accepting gifts, money, donations, or objects of value to avoid acts of corruption that contravene the Company's ethical principles, internal regulations, and applicable legal provisions.

If Company's employees are offered, by a third party or public official, any object of value, it must be reported immediately to the Compliance Officer so that he/she may proceed in accordance with the guidelines established in the Company's Compliance Program.

2.4 Hiring of Employees

When the Company hires employees, the Human Resources department must:

- a) Analyze the profile of the new employee, through interviews and relevant evaluations to identify whether he/she shares the Company's values.
- b) Ask questions to identify the existence - or not - of a conflict of interest for the Company.

Circumstances that could imply a conflict of interest for the Company include, among others, that the potential employee has relatives within the Company, that

his/her relatives are suppliers of the Company, or that his/her relatives are public officials according to the Company's Anti-Corruption Policy.

- c) If a conflict of interest is identified, contact the Compliance Officer before hiring.
- d) Ensure employee training, informing them of the provisions of the HR Policy, Code of Ethics, Anti-Corruption Policy, and other documents of the Company's Compliance Program.

2.5 Contracting of Third Parties

For the effective performance of its daily activities, the Company interacts directly and indirectly with third parties, including suppliers, contractors, third-party intermediaries, among others, who act on behalf of the Company.

Therefore, the Company shall implement due diligence processes prior to the contracting of any independent third-party to ensure that:

- a) a) Third parties know the content and are obliged to comply with the Code of Ethics and all the policies and internal controls of the Company's Compliance Program.
- b) The internal policies and mission of the third parties are consistent with the principles of the Company's Compliance Program.

2.6 Interaction with customers

Employees whose activities within the Company involve a direct relationship with customers, suppliers, and third-party contractors, among others, must at all times conduct themselves based on the following guidelines:

- a) Provide excellent service.
- b) Show availability for the requested assistance.
- c) If you are not able to provide the service, refer to the person who can adequately solve doubts.
- d) Be respectful and friendly.

2.7 Interaction with government officials

Due to the activities performed, the Company may have to interact with public officials, whether they are in official functions or through public entities.

The following are public officials:

- a) Any employee, salaried employee -for fees or under any other contracting regime- working in the public sector, whether at the federal, state, or municipal level, including employees of State Productive enterprises -such as the Federal Electricity Commission and Petróleos Mexicanos.
- b) Candidates or participants of political parties.
- c) Independent candidates for public office.
- d) Members of public international organizations, such as The United Nations and the World Health Organization.
- e) Any member of state-owned companies or companies with a certain level of state control or ownership.
- f) Subcontractors or employees of any company contracted by the government, to act on behalf of or to perform activities corresponding to the State.
- g) By consanguinity, relatives of public officials up to the fourth degree (father, mother, brothers, uncles, aunts, uncles, nephews, etc.).
- h) Any other individual defined as a public official under Mexican law.

Employees and third parties in the performance of activities on behalf of the Company:

- a) Are required to act with respect and integrity in interactions with public officials and proceed in accordance with applicable laws and the Company's Compliance Program.
- b) Are strictly prohibited from engaging in any conduct that may be considered in violation of anti-corruption and anti-money laundering laws.

Note: For more information on this last point, please refer to the Company's Anti-Corruption Policy, available at [canamfresh.com](https://www.canamfresh.com).

2.8 Use of assets and work tools

Employees shall use the tangible and intangible fixed assets owned by the Company, such as merchandise, warehouses, machinery, agricultural and packaging tools, computer equipment, mobile devices, transportation unit, nodes that provide information (internet), procedures, documentation, patents, information, among other assets owned by the Company.

The fixed assets specified in the preceding paragraph are the property of the Company, and employees may only use them for work purposes. Such assets must be used diligently and responsibly only to fulfill the functions entrusted to the employees to avoid, as far as possible, their deterioration or mistreatment.

It is strictly forbidden to misuse the Company's fixed assets or information for personal purposes or to transmit information to unauthorized individuals or individuals outside the Company, even if the employment relationship has been previously terminated.

2.9 Free Competition

Free competition is necessary for market improvement, contributing to the growth of the Company and the well-being of all Stakeholders. The Company is committed to respecting all its competitors and avoiding any act of unfair competition. The following or any other similar conduct is strictly prohibited:

- a) Agreement, covenant, and/or understanding with competitors for:
 - × Fix prices and/or bids in tenders.
 - × Restricting the market, i.e., the obligation not to produce, process, distribute, commercialize or acquire, only for a limited quantity of goods and the provision, transaction in volume, or limited frequency of services.
 - × Dividing, distributing, allocating or imposing portions, or segments of an actual or potential market for goods and services.
- b) Exchange confidential information with competitors.
- c) Fix resale prices.
- d) Sell, purchase or perform a transaction under the conditions of not using, acquiring, selling, marketing, or providing the goods or services produced, processed, distributed, or marketed by a third party natural or legal person.

- e) To participate in a boycott, i. e., unilateral action referring to the refusal to sell, market, or supply goods and/or services to certain persons, when normally it is offered to third parties.

2.10 Confidentiality and Protection of Personal Data

When Stakeholders share data and information with the Company, it is mandatory to keep it secure and use it along with the technology ethically as expected. The Company is committed to using technology responsibly, respecting individuals' privacy, and protecting their data.

Therefore, employees who have access to Stakeholders' personal data as a result of their duties within the Company must:

- a) Managing technology and personal or business information by demonstrating an understanding and respect for its importance to the individual and the Company.
- b) Being clear about the information we collect and the purpose for which we collect it. When we collect information from individuals, we must be clear about what information is being collected, and we must inform the individual why we need it.
- c) Being honest, transparent, and open about how a person's information will be used, and never using that information for different purposes.
- d) Knowing how much data is collected and how long it is stored.
- e) Store and protect all the information collected.
- f) Protect business and personal information from unauthorized access or disclosure.
- g) Report any suspected unauthorized access or disclosure immediately through the local data incident reporting channel.
- h) Being familiar with the Company's internal policies, procedures and data controls that apply to your position.

VII. SANCTIONS

If any conduct that potentially breaches the Code of Ethics or other internal policies and controls of the Company's Compliance Program is detected, the Compliance Officer will

initiate the corresponding investigation following the procedures established in the Anti-Corruption Policy.

Once the investigation is concluded, the Compliance Officer and the Board of Directors shall determine the applicable sanction taking into account the following factors:

- a) Seriousness of the fact and/or conduct.
- b) Hierarchy of the offender.
- c) Recidivism of the offender, if applicable.
- d) Violation of any law or regulation in force.
- e) Economic and reputational damage caused to the Company and/or any other individual directly or indirectly related to it.

The sanction determined may consist of one or more of the following:

- a) Verbal warning.
- b) Sanction Report.
- c) Administrative Report.
- d) Termination of the employment relationship.
- e) Complaint before the corresponding authorities.

Note: For sanctions applied to third parties, they shall be assessed and imposed according to the seriousness of the breach and the interaction of the third party with the Company.

VIII. REPORTING CHANNELS

Any conduct deemed a breach of the Compliance Program, or any applicable legal provision must be reported through the following channels:

- Phone: [519-773-3250]

- E-mail: [humanresources@canampepper.com]
- Electronic mailbox available on the site: [canamfresh.com]
- Mail to the address: [52999 John Wise Line Aylmer Ontario N5H2R5]

The Company will at all times protect the confidentiality of whistleblowers and will not allow retaliation against them.

The Compliance Officer will analyze the report, ensuring equal treatment in compliance with the Company's policies, local legislation, and international best practices.

IX. CONTACT

If you have any doubts as to whether any activity is contrary to the Code of Ethics or any provision of the policies and protocols of the Company's Compliance Program, please contact the Compliance Officer, who will advise you on how to carry out your activities ethically and professionally, in compliance with the applicable regulations.