



ANTI-CORRUPTION POLICY
-CAN AM FRESH MEXICO, S. DE R.L. DE C.V.-

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I. TRACK OF CHANGES

VERSION	DATE	CHANGE DESCRIPTION	JUSTIFICATION	IMPLEMENTED BY:	APPROVED BY:
01		First Edition	New	T.J. Bauer	[Jammie Underhill]

II. PURPOSE OF THE ANTI-CORRUPTION POLICY

Although "corruption" covers a very wide range of phenomena (corruption can be understood in an individual moral sense, in a collective moral sense, in a spiritual sense, etc.); in the Anti-Corruption Policy we will refer to corruption as "*the illegitimate use of public power for private benefit*".

As for the situations and actions covered by the phenomenon of corruption, they include the 'bribe' given by any commercial establishment to obtain licenses and permits, or by a driver to the traffic police, unjustified favors in the context of multimillion public bids, clandestine agreements for the enactment of certain laws with certain content or the practice or not of some specific public policy, the issuance of judicial decisions in one direction or another, financing of electoral campaigns outside the legal framework, etc.

Corruption significantly affects the provision of public services, economic development, respect for Human Rights, and the rule of law. Organized civil society is an important factor in mitigating and reducing corruption.

Mexico suffers from a major corruption problem. Transparency International reported in the Corruption Perceptions Index 2021, published in January 2022, that Mexico ranks 124th out of 180 countries in its corruption perception ranking in the public sector.

Globalization and the growth of national economies have brought the diversification of acts of corruption and challenges to fight them. Currently, this phenomenon requires coordinated measures between the state and individuals, with a collaborative approach involving all the actors of society.

Through corporate ethics, a culture of integrity, transparency, the adoption of international best practices, and active participation in the fight against corruption, companies will be able to comply with the required social responsibility standards.

The purpose of the Anti-Corruption Policy of CAN AM FRESH MEXICO, S. DE R.L. DE C.V. (the "Company"), is to establish the guidelines in anti-corruption matters within the Company, to comply with the ethical standards of the Code of Ethics, the legal provisions in anti-corruption and prevention of money laundering. For the Company, any act of

corruption not only represents a breach of the law but also undermines the daily work and intangible value of the Company.

Furthermore, through the Company's Anti-Corruption Policy (the "**Anti-Corruption Policy**"), we consolidate the commitments of the Human Rights Policy of [Can Am Pepper Company LTD.] and its affiliates and subsidiaries (the "**HR Policy**").

III. SCOPE OF THE ANTI-CORRUPTION POLICY

The Anti-Corruption Policy applies to our shareholders, members of the board of directors, employees, customers, suppliers, business partners, officers, social groups with whom we interact, and, in general, to those who act on behalf of and/or represent the Company (the "**Stakeholders**"). We encourage Stakeholders to conduct their daily activities ethically and to join us in our fight against corruption.

The Company reserves the right to terminate the contractual relationships it has with any of the subjects referred to in the immediately preceding paragraph, in case of violation of the provisions set forth in the Anti-Corruption Policy, in addition to initiating any legal action that may be appropriate.

The content and implementation of the Anti-Corruption Policy shall in no case be contrary to national and international regulations. In case of contradictions, the Anti-Corruption Policy shall be amended immediately.

IV. 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 that make up 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. Human Resources Department

a) Promptly follow up on compliance with the Anti-Corruption Policy.

b) Conduct and supervise due diligence processes during contracting processes.

4. Internal Staff/ Third Parties

a) Comply with the Anti-Corruption Policy.

b) Report any act or omission that contravenes the provisions of the Anti-Corruption Policy and other internal regulations of the Company.

V. LEGAL FRAMEWORK

The legal framework applicable to the Anti-Corruption Policy includes, among others, the following:

- a) The General Law of Administrative Responsibilities.
- b) The Federal Criminal Code.
- c) The Criminal Code of the states in which the Company has operations.
- d) The National Code of Criminal Procedures.
- e) The Organic Law of the Attorney General's Office.
- f) The General Law of Victims.
- g) The Federal Law for the Prevention of Operations with Illicit Sourced Funds.
- h) Other applicable laws and/or regulations.

Furthermore, the Anti-Corruption Policy includes the highest international standards in anti-corruption matters, including:

- a) The United Nations Convention against Corruption.
- b) The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.
- c) Anti-corruption regulations and best practices.

VI. DEFINITIONS

1. Public Official

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.

2. Bribe

The offer, promise, or delivery of any benefit or object of value to a public official, for him/her to do or omit an action related to his/her functions, employment, position, or commission.

3. Bribery

The crime of offering, promising, or giving a bribe.

4. Object of Value

The term "object of value" should be understood extensively, (i.e., not limited to cash). Also considered "objects of value" are, among others, gifts, entertainment donations, travel expenses, meals, theater or movie tickets, tickets to sports events, travel, hospitality, favors, job offers, and, in general, any other object or benefit with a tangible or intangible value.

5. Money Laundering

Conduct consisting of:

- a) Acquiring, disposing of, administering, taking custody, possessing, exchanging, converting, depositing, withdrawing, giving or receiving for any reason, investing, carrying or transferring, within the national territory to abroad or vice versa,

resources, rights or goods of any nature, when you are aware that they originate from or represent the proceeds of an unlawful activity.

- b) To conceal or attempt to conceal the nature, origin, location, destination, movement, ownership, or title of resources, rights, or goods, knowing they originate from or represent the proceeds of an unlawful activity.

6. Proceeds of Unlawful Activity

Resources, rights, or goods of any nature, when there are well-founded indications or certainty that they originate directly or indirectly or represent the proceeds of a crime and their legitimate origin cannot be proved.

VII. GUIDELINES

1. Prohibition to Bribe

Employees and third parties acting on behalf of or representing the Company or maintaining a business relationship with it, under no circumstances may promise, offer or deliver directly or indirectly to any public official any benefit or object of value to obtain an undue advantage or benefit, consisting of the public official doing or omitting an activity related to his or her functions, employment or position.

It is important to note that anti-corruption laws do not condition the existence of the act of corruption -and its consequent sanction- to the value of the object or its effective delivery or acceptance by the public official. Therefore, the mere offering or promise of delivery of any object of value constitutes the potential crime of bribery and the violation of the Anti-Corruption Policy.

Any violation of the Anti-Corruption Policy hinders our commitment to civil society to fight corruption from the private sector, jeopardizes the Company's reputation, and constitutes a criminal conduct punishable by imprisonment under the Federal Criminal Code and the Substantive Criminal Codes of the Federal Entities.

2. Prohibition of Other Illegal Practices

Employees and third parties acting on behalf of or in the representation of the Company or maintaining a business relationship with the Company are prohibited from the following conducts:

- a) **Unlawful participation in administrative proceedings:** it consists of acts or omissions to participate in administrative proceedings, whether federal, local, or municipal, notwithstanding that by the provision of law or resolution of the competent authority is prevented or disqualified for that purpose. Likewise, when an individual intervenes on his behalf but in the interest of other individuals who are prevented or disqualified from participating in administrative proceedings.

- b) **Influence peddling:** using influence, economic or political power real or fictitious, over any public official to obtain a benefit or advantage, or to cause harm to any individual or the public official, regardless of the achievement of the result sought.
- c) **Misuse of public resources:** to appropriate, misuse, or deviate public, material, human, or financial resources from the purpose for which they were intended. As well as any circumstance in which such resources are handled, received, administered or accessed.
- d) **Improper hiring of former public officials:** hiring a person who served as a public official during the previous year, who possesses privileged information directly acquired because of his/her employment, position, or commission in the public service, and directly allows the contractor to benefit in the market or place himself in an advantageous situation compared to his competitors.

3. Gifts and Entertainment

3.1 In favor of public officials

Under the provisions of the General Law of Administrative Responsibilities, and the Resolution Issuing the Provisions on the Receipt and Disposition of Gifts or Similar Objects by Public Officials of the Federal Government, issued by the Secretary of Public Function, employees and third parties acting on behalf of or in the representation of the Company or maintaining a business relationship with it, are strictly prohibited from promising, offering or delivering directly or indirectly to a public official an object of value. The above even if with the promise, offer, or delivery of the object of value the individual does not intend to obtain an undue benefit for himself or a third party.

3.2 In favor of employees and related third parties

It is strictly forbidden for employees and third parties acting on behalf of or in the representation of the Company or in a business relationship with the Company to receive directly or indirectly an object of value from a public official or private individual.

If employees and third parties acting on behalf or in the representation of the Company or maintaining a business relationship with the Company are offered an object of value by a private third party or public official, the Compliance Officer must be informed immediately to proceed according to the procedures established in the Company's Compliance Program.

4. Anti-laundering provisions

The Anti-Corruption Policy prohibits any conduct that could constitute the crime of transactions with illicit sourced funds known as "money laundering," as provided in Article 400 Bis of the Federal Criminal Code. These conducts consist of:

- a) Acquire, dispose of, administrate, have custody of, possess, exchange, convert, deposit, withdraw, give or receive for any reason, invest, transfer, transport or transfer, within the national territory, from the national territory to a foreign country or vice versa, resources, rights or goods of any nature, knowing that they originate from or represent the proceeds of an illicit activity; or,
- b) Concealing, or attempting to conceal the nature, origin, location, destination, movement, ownership or property to resources, rights or goods, knowing that they originate from or represent the proceeds of an unlawful activity.

In addition, it is strictly forbidden to comply with obligations and, in general, to settle or pay, as well as to accept any settlement or payment through cash, in local currency or foreign currency and precious metals, in the cases provided for in Article 32 of the Federal Law for the Prevention and Identification of Transactions with Illicit Sourced Funds.

5. Donations, Shares in Corporations, Coalitions, Non-governmental Organizations and Federal Entities

The Company is committed to social causes that support the communities in which it operates. Consequently, the Anti-Corruption Policy establishes the basis for responsibly supporting the development of civil society.

To the extent possible and in accordance with applicable laws, the Company will support and contribute, through donations, to public and private entities. In order to make donations, the Company must comply with the following requirements:

- a) Prior to making a donation, the Company must carry out a due diligence procedure in order to clarify any circumstances that could affect the Company and jeopardize compliance with its internal regulations (*i.e.*, if the grantee has been investigated or sanctioned for corruption or money laundering, potential conflict of interest, etc.).
- b) Only authorize donations to duly registered associations or public entities when there is an official donation program.
- c) Obtain a receipt and/or invoice from the organization or entity to which the donation is delivered. The receipt and/or invoice must specify the purpose of the donation, the program used and a detailed description of the donated item.
- d) Follow up with the grantee to ensure the donation is use for the agreed purposes.

- e) Donations may only be authorized by the Board of Directors.

It is strictly forbidden to make any donation directly or indirectly in favor of political parties, candidates for public office, at the request of any public official, and in general, any donation whose purpose is to obtain an undue benefit.

6. Engagement of third parties

Employees responsible for contracting third parties must carry out a due diligence process before any contracting to identify, among others:

- a) Whether the individual or company has been investigated or sanctioned for corruption or money laundering.
- b) Potential conflicts of interest.
- c) For companies, whether they have an internal Compliance Program whose values are consistent with those of the Company.
- d) Risk classification of the potential business relationship.

The Company must take into consideration the following factors to determine potential risks and whether the third parties with whom it intends to contract to meet the anti-corruption standards established in the Anti-Corruption Policy and other regulations that integrate the Company's Compliance Program:

- a) Nature of the business relationship.
- b) Purpose of the business relationship.
- c) Location and external factors such as the Corruption Perception Index issued by the Transparency International Organization.
- d) Level of interaction with the government.
- e) Amount of the agreement to be entered.
- f) History of the third party to be contracted in the Company and previous experiences in similar cases.
- g) Reputation of the third party in the corresponding market.

- h) Type and practices of the corresponding industry.
- i) Management and transfer of personal data.
- j) Management of non-invoice or cash payments.

Once the risk to which the Company could be exposed has been classified in the event of engaging the third party, the due diligence process will be carried out in accordance with the following:

Risk Level	Due diligence requirements
Low	<ul style="list-style-type: none"> ▪ Internet research for adverse information. ▪ Specialized database research to ensure that they are not listed by any government or entity. ▪ Completion of anti-corruption questionnaire. ▪ Signing of agreement and/or purchase order with anti-corruption clause and endorsement to the Company's internal Compliance Program.
Medium	<ul style="list-style-type: none"> ▪ Internet research for adverse information. ▪ Specialized database research to ensure that they are not listed by any government or entity. ▪ Completion of anti-corruption questionnaire. ▪ Signing of agreement and/or purchase order with anti-corruption clause and endorsement to the Company's internal Compliance Program. ▪ Review of legal incidents. ▪ Review of the company's capital stock distribution and investigation of majority shareholders, if applicable. ▪ Review of mechanisms implemented for the Criminal Compliance Management System, if applicable.
High	<ul style="list-style-type: none"> ▪ Internet research for adverse information. ▪ Specialized database research to ensure that they are not listed by any government or entity. ▪ Completion of anti-corruption questionnaire. ▪ Signing of agreement and/or purchase order with anti-corruption clause and endorsement to the Company's internal Compliance Program. ▪ Review of legal incidents. ▪ Review of the company's capital stock distribution and investigation of majority shareholders, if applicable. ▪ Review of mechanisms implemented for the Criminal Compliance Management System, if applicable; ▪ External due diligence process. ▪ Training and certification of key employees.

Risk Level	Due diligence requirements
	<ul style="list-style-type: none"> ▪ Audit and review of key documents. ▪ Interviews with key personnel and employees.

7. Training and Qualifications

The Company, through the resources created for this purpose, will inform the Stakeholders of the content and scope of the Anti-Corruption Policy and any changes or updates that may be implemented to it. All employees and third parties must acknowledge and sign the Anti-Corruption Policy.

The Company will conduct at least one mandatory training per year for internal personnel regarding the content and scope of the Anti-Corruption Policy and best practices in this matter. All new employees must be trained during the corresponding induction regarding the Anti-Corruption Policy and other policies and internal controls included in the Company's Compliance Program.

8. Audits

Designated personnel and/or independent third parties shall conduct periodic audits and monitoring of the Company's relevant operational and corporate activities to verify and ensure compliance with the guidelines established in the Anti-Corruption Policy and other policies and controls of the Company's Compliance Program.

Monitoring and audits must have mechanisms that allow the correct follow-up, evaluation, and measurement of the implementation and compliance with the Anti-Corruption Policy and other policies of the Company's Compliance Program. The evaluation periods shall be in accordance with the following:

- a) Audits: annual;
- b) Monitoring: biannual.

VIII. PROTOCOL IN CASE OF BREACH

The initiation of an internal investigation for potential non-compliance with the Anti-Corruption Policy and/or other policies of the Company's Compliance Program may occur in the following cases:

- a) **Complaint:** when an anonymous or subscribed complaint is received from an employee and/or third party through the reporting channels established by the Company.

- b) **Detection of non-compliance:** when the Compliance Officer detects a violation of the Anti-Corruption Policy and/or other policies of the Company's Compliance Program.

In both cases, the Compliance Officer must analyze the facts and report them to the Board of Directors, in order to evaluate whether they represent a potential violation of the Company's Compliance Program and, consequently, whether they should be formally investigated.

If necessary given the seriousness of the facts reported or detected, the Compliance Officer and the Board of Directors may decide to proceed immediately -before the internal investigation is initiated- with the filing of a criminal claim before the competent public prosecutor's office.

Every internal investigation has its particularities. However, the following are the general stages of any internal investigation, which will be led at all times by the Compliance Officer and/or a third-party expert hired by the Company, in coordination with the Board of Directors.

i. Delimit the nature of the research

- a) Analyze the facts under investigation.
- b) Identify the individuals directly or indirectly involved (perpetrators, witnesses, and individuals who could help to clarify the facts).
- c) Analyze the relationship of the individual(s) under investigation with the Company.
- d) Identify the internal policies and controls applicable to the specific case.
- e) If necessary, hire independent experts (i.e., forensic experts).
- f) Follow the guidelines established in the laws or regulations that could be relevant to the investigation process (i.e., personal data protection laws, labor laws, etc.).

ii. Implementation of measures to prevent the destruction of evidence

- a) Protection of whistleblower, if any.
- b) Preservation of documents: document retention notice and chain of custody.

- c) Removal of the individual under investigation from the work area during the investigation if necessary for the preservation of evidence and/or protection of the victim and/or whistleblower
- d) Restricting access to certain records, systems and/or information.
- e) Manage all information derived from the investigation as confidential.
- f) Analyze the documentary support obtained, in order to clarify the facts investigated and the seriousness of the conduct reported.
- g) Request the support of various departments and/or areas of the Company, if necessary to collaborate in the investigation.

iii. Obtaining evidence

- a) Document Review.
 - ✓ Draft a document review protocol (or any other type of evidence), indicating the mechanism for classifying documents and information.
 - ✓ The documents and information to be reviewed should be related to the nature of the facts, the internal structure of the Company, the Company's Compliance Program, electronic information to which the investigated parties have access, etc.)
 - ✓ After analyzing the documentation and information considered relevant, it is possible to determine the need to broaden the scope of the investigation and, consequently, request and analyze more documents.
 - ✓ Furthermore, at this stage it is possible to determine the individuals to be interviewed.
- b) Interviews with witnesses and individuals under investigation.
 - ✓ Draft interview protocols.
 - ✓ If a lawyer is present, prior to the interview, the interviewee must be notified that the representation is in favor of the Company, and not for employees or third parties.
 - ✓ When the interviewee is the whistleblower, the interview should be conducted in a place specifically designated for this purpose, to preserve his/her anonymity.
 - ✓ If the interviewee is the individual under investigation, it is important to avoid confrontation during the interview. The interview should be conducted in an environment of professionalism and kindness, in order to learn the interviewee's version of the facts.

- ✓ Request the witnesses interviewed to only report facts of which they are directly aware and not opinions or assumptions. Indirect witnesses will not have the same evidentiary value.
- ✓ Be flexible to new facts revealed by the interviewee and be able to formulate questions in relation to the new facts.

iv. Findings report

Once the stages described in the previous sections have been completed, the Compliance Officer or hired third-party expert will prepare a final report with the steps of the investigation, the main findings, the risk mitigation strategies, and the suggested corrective measures, such as warnings or termination of the employment relationship of the investigated individual, reporting the facts to the competent authorities, etc.

If the findings of the final report indicate the need to file a complaint before the Public Prosecutor's Office, the Board of Directors shall instruct the Compliance Officer to that effect.

The Compliance Officer, or the individual designated by the Board of Directors, as long as he/she has the necessary proxies, shall file the criminal claim, and shall exhibit as evidence the findings report, as well as any documentation or information required by the Public Prosecutor's Office, to assist in the integration of the investigation file.

The Compliance Officer shall keep the Board of Directors informed of the status of the criminal claim filed before the Public Prosecutor's Office and the integration of the corresponding investigation file.

IX. SANCTIONS

If any conduct potentially breaching the Anti-Corruption Policy or other policies and internal controls of the Company's Compliance Program is detected, the Compliance Officer shall initiate the corresponding investigation under the procedures outlined in Chapter VIII. of this 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.

X. REPORTING CHANNELS

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

- Phone: [519-772-3250]
- E-mail: [Humanresources@canamfresh.com]
- Electronic mailbox available on the site: [canamfresh.com]
- Mail to the address: [5299 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.

XI. CONTACT

In case of any questions or comments regarding the Anti-Corruption Policy, please contact the Compliance Officer at [519-773-3250].