



CODE OF CONDUCT

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MESSAGE FROM THE CEO



Raul Mendiola

The growth and recognition of our work begins with the fair and honest treatment of our entire network of employees, regardless of their contractual relationship, role, hierarchical position and seniority, members of corporate bodies, shareholders, suppliers, service providers, customers and partners. There is no growth without ethics.

That is why our values and principles are based on a physically and emotionally safe environment for everyone, where differences are truly valued.

This Code of Conduct will guide all our employees, members of governing bodies, shareholders, suppliers, service providers, customers, and partners in adopting the core values that underpin Manty's success. We all have a responsibility to ensure that our actions are aligned with our values in order to build trust and loyalty.

The fruit of our labour is a key part of people's daily lives, and for this reason we are deeply proud, maintaining our aspiration to become the most trusted successful company in the world.



ORGANISATIONAL CULTURE

Manty's Culture is composed of the set of practices, beliefs and behaviours that shape our identity, reflecting our Mission, Vision and Values.

Manty is recognised for offering innovative solutions in the areas of marketing, processing and distribution of food and non-food products to our African partners in the industrial, food and agricultural sectors. We have a diverse portfolio of products from all corners of the world.

MISSION

We believe in and value human potential, both within and outside our organisation.

VISION

Empowering the African business community through a platform for R&D, know-how and economic support.

VALUES



OUR PEOPLE

We believe in and value human potential, both inside and outside our organisation.



COMMITMENT TO THE CUSTOMER

Manty is focused on the needs and expectations of our customers, our daily motivation



SIMPLICITY

At Manty, we do not believe in extravagance and waste, which is why we prioritise resource efficiency without compromising quality.



CORPORATE RESPONSIBILITY

THE CODE OF CONDUCT

Manty's Code of Conduct represents our values, as well as the required standards of behaviour, which are aligned with our commitment to our employees, members of governing bodies, shareholders, suppliers, service providers, customers and partners. Manty's Code of Conduct aims to guide the behaviour of everyone who interacts with us, promoting and encouraging the adoption of practices aligned with our values. As such, it is mandatory, regardless of role, responsibilities, hierarchical position, or seniority.

To this end, Manty provides training to its employees.

This Code of Conduct is aligned with and should be linked to the Internal Regulations, Policies and Procedures, which may be revised at the discretion of Manty's Management.

TO WHOM IT APPLIES

This Code of Conduct applies to all employees, regardless of their contractual relationship, role, hierarchical position or seniority, members of corporate bodies, shareholders, suppliers, service providers, customers and partners of Manty, regardless of the territory in which they are located.

Violation of the Code of Conduct by any of the recipients may harm Manty and its reputation and, for this reason, will not be tolerated and may result in consequences for the offender.

What is expected of me as a recipient of this Code of Conduct? Everyone must adopt the practices and principles contained in this Code of Conduct, and their decisions and behaviour must be based on integrity and transparency, as well as loyalty to Manty's interests.



CORPORATE RESPONSIBILITY

AS SUCH, THEY MUST:

- Read the Code of Conduct, study it and expressly accept it;
- Always keep in mind Manty's Mission, Values, Principles and Standards in everything they do;
- Set an example by complying with the Code, especially Manty employees, who must implement it and demand compliance from all their peers, subordinates, as well as suppliers, service providers, customers and partners.

They must comply with, and, in particular, employees must ensure that their subordinates comply with, all applicable laws and, in particular:

- Labour and social security legislation;
- Legislation on discrimination, slave labour, forced labour and child labour;
- Legislation on discrimination;
- Legislation on health, safety and the environment at work;
- Competition legislation;
- Data protection legislation;
- Tax, customs and parafiscal legislation, both national and international;
- Environmental legislation;
- Money laundering legislation.



CORPORATE RESPONSIBILITY

HOW TO REPORT IRREGULARITIES?

Any acts contrary to this Code of Conduct, as well as any acts provided for in the Ethics Hotline Regulations adopted by Manty, whether committed intentionally or negligently, that may constitute a crime or administrative offence, must be reported or denounced through the ETHICS HOTLINE: linha.etica@manty.ch. The recipients of this Code should consult the Ethics Hotline Regulations published by Manty in order to obtain all the information about how it works and the procedures for reporting complaints.

Do you have questions about whether a particular behaviour or omission should be reported?

Ask yourself:

- Are these decisions or actions in accordance with this Code of Conduct and Manty's principles?
- Is there any personal or conflict of interest?
- Does the behaviour or omission protect Manty's interests?
- Would I be proud of this action if it were made public? What would happen if it appeared in the media?

If in doubt, you should contact your Line Manager or the Human Resources Department, and avoid conducting investigations on your own, as the behaviour or omissions may be based on a breach of legal provisions, including criminal law.



CORPORATE RESPONSIBILITY

THE ROLE OF MANAGERS

Managers must set an example by promoting a culture of transparency, openness and integrity, where everyone feels comfortable raising issues and reporting their concerns. Managers must reinforce compliance with the code of conduct and must also be available to listen to the team's questions and concerns and take action in the event of potential breaches or omissions of the principles contained in Manty's Code of Conduct.

COMPLIANCE WITH REGULATIONS

Manty is committed to complying with all applicable laws and regulations in all jurisdictions where it operates, and all its employees must make the same commitment.

None of the recipients of the Code of Conduct should engage in any act, of any nature whatsoever, on behalf of Manty, when such act violates the provisions of this document, as well as the law.

Any behaviour incompatible with this Code of Conduct must be immediately reported through the Ethics Hotline, a channel provided by Manty for reporting irregularities. After the report, Manty will take the appropriate steps to investigate the reported practices, and the whistleblower shall not, under any circumstances, be subject to any retaliation.



ETHICAL PRINCIPLES

INTEGRITY

RELATIONSHIPS WITH SUPPLIERS, SERVICE PROVIDERS, CUSTOMERS, PARTNERS AND EMPLOYEES

At Manty, institutional relationships, whether with employees, suppliers, service providers, customers or partners, are based on the application of ethical principles. We promote a transparent environment and act with respect for the dignity of all people. It is people who create our success, which is why we offer opportunities for development and continuous training, ensuring them the opportunity for personal and professional growth. We believe in maintaining lasting and mutually beneficial relationships. Therefore, everyone is expected to behave in an irreproachable manner, based on mutual trust and mutual support, with a view to customer satisfaction and our commitment to service quality.

Manty considers compliance with this Code of Conduct to be essential and aims to make its recipients aware of the impact of actions that are not in line with Manty's principles, culture and image. In fact, it is essential that everyone:

1. Respects internal rules and procedures;
2. Uses appropriate rules of etiquette, courtesy, and behaviour to maintain a good working environment.
3. Works as a team;
4. Is honest, acts with integrity and does not discriminate;
5. Ensures adequate communication with customers;
6. Responds appropriately, in a timely manner and with the standard of professionalism required of our partners;
7. Maintains and promotes Manty's good reputation.



ETHICAL PRINCIPLES

INTEGRITY

CONFLICT OF INTEREST

A conflict of interest arises whenever, in a given situation, an employee or someone close to them may benefit, directly or indirectly, and such private interests interfere with Manty's interests.

Manty promotes impartiality and fairness in relations between its employees, suppliers and customers. As such, recipients of the Code of Conduct should not decide or attempt to use their position to influence any decision whatsoever when they are in a situation of conflict of interest.

Any situation that may constitute a conflict of interest must be immediately reported by the employee to their line manager or to Manty's management so that the necessary measures can be taken to resolve the potential conflict of interest in a manner that best suits the interests of Manty and the employee.



ETHICAL PRINCIPLES

INTEGRITY

ACCESS TO AND USE OF CONFIDENTIAL INFORMATION

At Manty, employees have access to confidential information, namely relating to trade secrets, which is necessary for the performance of their duties. As such, they are bound by obligations of confidentiality, non-disclosure and/or misuse of such information, both against Manty and against third parties.

Manty assigns different levels of access to information to each employee, according to the needs of their role, denying or restricting access to information that is deemed unnecessary. This differentiation is important for the fulfilment of contractual obligations with customers, suppliers and other entities, ensuring the confidentiality of information, particularly in terms of trade secrets.

Failure to comply with confidentiality obligations may result in Manty's breach of contract with its customers, suppliers, service providers and partners. For this reason, it is important that employees are aware of the need to comply with these obligations, as well as the consequences of non-compliance, including disciplinary action. Employees are bound by the obligation of confidentiality even after the termination of their contractual relationship with Manty.



ETHICAL PRINCIPLES

INTEGRITY

USE OF PROPERTY AND EQUIPMENT

All work tools provided by Manty to its employees, namely computer equipment, are the property of Manty and are intended for professional use.

Equipment must always be used responsibly, and access to websites that promote or display images or messages considered legally abusive is prohibited. You must also refrain from sending messages containing inappropriate language or making offensive comments that could damage the image of any person or Manty. Manty has adopted internal regulations governing the use of computer equipment, email and internet access, which are intended to regulate these matters. The regulations have been communicated to all employees, who are bound to comply with them in full.

PRIVACY AND PERSONAL DATA

Manty respects the privacy of all its employees, suppliers, and customers, ensuring that their personal data is handled responsibly and in compliance with current legislation, in particular with full respect for national and European legislation on the protection of personal data.

In fact, Manty employees are prohibited from disclosing personal data to which they have had access in the course of their duties, under penalty of Manty reserving the right to take disciplinary action against the respective offenders.



ETHICAL PRINCIPLES

INTEGRITY

DOCUMENT AND RECORD PRESERVATION

Manty complies with the legally required preservation periods for documents and records, and the same is expected of the recipients of this Code of Conduct. No employee shall destroy documents or records before the end of the legally stipulated preservation period. Failure to comply with this requirement may have serious consequences for Manty, particularly if the documents or records are relevant for legal purposes.

Records may take any form, including any document, recording, photograph, computer file, and email. To ensure compliance with these duties, Manty has implemented a Preservation Period Policy, which has been disclosed to all employees, who are required to be familiar with and comply fully with it.

INTELLECTUAL PROPERTY

The protection of intellectual property is essential for the company to maintain and increase the competitiveness of its business. In relations with third parties, procedures, methods or any confidential information should not be disclosed, including information about trade secrets relating to Manty's activity and which sets us apart in a positive way.

It is the responsibility of each department to raise awareness of the importance of protecting Manty's intellectual property. We disclose what we do, but not how we do it.



ETHICAL PRINCIPLES

TRANSPARENCY

ANTI-CORRUPTION RULES

Corruption consists of accepting or offering advantages with the aim of influencing another person's decision or improper behaviour.

Manty does not tolerate unethical practices aimed at obtaining benefits and advantages for itself or for third parties.

Employees must not accept, for their own benefit or that of third parties, goods, services or any advantages from Customers, Suppliers, Service Providers, authorities or any other individual or collective entity.

Only offers that are socially appropriate and comply with the legal standards applicable in each country where Manty operates may be accepted.

Regardless of how they operate, Manty requires the same commitment from its business partners.

Employees who engage in any act that violates anti-corruption rules will be held legally and disciplinarily liable.

Manty has instituted an Anti-Corruption and Related Offences Code, which has been disclosed to all its employees, suppliers, service providers and partners, who are required to comply with it in full.

POLITICAL CONTRIBUTIONS

Manty is also committed to complying with the rules on political donations in all countries where it operates, meaning that no donations may be made on behalf of and/or in the name of Manty.



ETHICAL PRINCIPLES

TRANSPARENCY

ANTI-COMPETITIVE PRACTICES

Manty complies with competition rules in all jurisdictions where it operates. As such, Manty employees:

- Must strictly comply with competition law;
- Must not meet with competitors or enter into agreements with competitors that involve: i) the direct or indirect fixing of prices or terms of trade;
- Must ensure the confidentiality of information, in particular that relating to trade secrets;
- Must not receive commercial information from their competitors;
- Must not disclose or use commercial information: Obtained by illegal or illicit means (theft, fraud, eavesdropping, computer intrusion, invasion of privacy, bribery, etc.);
- Must not make the conclusion of contracts subject to conditions that are unrelated to the subject matter of those contracts.

Violation of the rules may result in Manty having to pay substantial compensation and the imposition of sanctions on employees involved.

MONEY LAUNDERING

Manty strictly complies with applicable national and international legal provisions on money laundering.

Financial records are one of the main mechanisms for controlling Manty's activity in this area. The inviolability of these records is key in order to prevent the existence or suspicion of money laundering.



ETHICAL PRINCIPLES

SOCIAL RESPONSIBILITY

SOCIAL RESPONSIBILITY AND SUSTAINABILITY

At Manty, in addition to environmental responsibility, we are concerned with social responsibility, which can never be separated from a sustainable corporate culture. Manty acts in a socially responsible manner towards its employees, suppliers, customers and society in general, going beyond its legal obligations.

The concept of Corporate Social Responsibility (CSR) covers all measures with an environmental and social impact in general, and on the company's own employees in particular.

In fact, Manty ensures and requires its employees to:

- Respect the values of justice, legality, integrity, honesty, loyalty, solidarity, inclusion, and transparency;
- Respect fundamental rights to safety, health, and wellbeing in the workplace;
- Respect the rights to privacy, equal opportunities and non-discrimination, freedom of expression, the right to representation, and the right to training and updating.

We believe in a fairer and more sustainable world, in which we want to involve everyone who is part of Manty.



ETHICAL PRINCIPLES

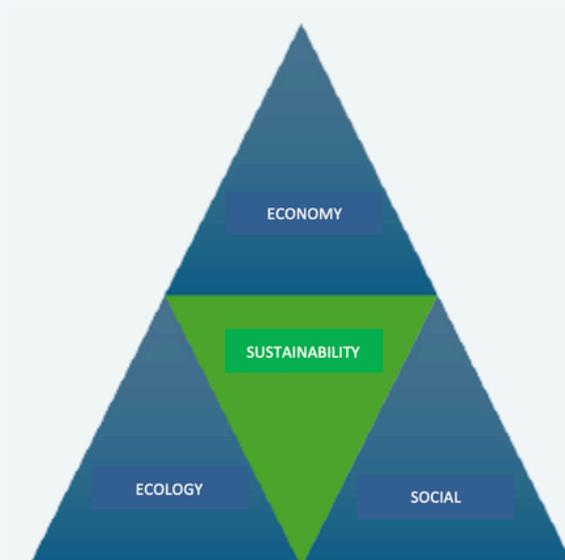
SOCIAL RESPONSIBILITY

EQUALITY AND DIVERSITY IN THE WORKPLACE

AManty values diversity as a driver of innovation and advocates for equity and inclusion among its people, providing equal employment opportunities to all its employees based on qualifications and merit, without discrimination based on ethnicity, race, colour, creed, religion, nationality, age, disability, gender, sexual orientation, family situation, marital status, political or ideological beliefs, union membership, or any other situation legally protected under applicable laws and regulations. Discriminatory behaviour is not tolerated, and equal opportunities are promoted, ensuring integrity and dignity in the workplace.

Manty complies with all applicable legal obligations in labour matters in all jurisdictions where it operates and promotes the well-being of its employees, aiming to help them balance their professional responsibilities with a healthy personal and family life.

PILLARS OF SUSTAINABILITY





ETHICAL PRINCIPLES

SOCIAL RESPONSIBILITY

HEALTH, HYGIENE AND SAFETY AT WORK

Manty is committed to ensuring a safe, pleasant, non-discriminatory working environment that promotes the well-being and productivity of its employees.

Manty complies with applicable legislation on health, hygiene and safety at work in all jurisdictions where it operates, through the adoption of preventive measures, the provision of resources and the active promotion of awareness-raising and training activities among its employees.

For this reason, we recognise and expect everyone to play an active role in promoting a safe and healthy environment, in accordance with applicable legislation.

Employees must behave in accordance with safety standards.

Employees, suppliers and customers under the influence of drugs, alcohol or illegal substances are prohibited from entering and remaining on Manty's premises. Employees will be subject to the applicable disciplinary measures.

RESPECT FOR THE ENVIRONMENT

Manty conducts its business with a view to creating long-term value, respecting the principles of sustainability and corporate and environmental social responsibility. Reducing the consumption of paper, plastic, energy and CO2 emissions is a constant concern for Manty, which encourages its employees to make this a daily practice.



TERM OF COMMITMENT

I DECLARE THAT I HAVE RECEIVED, READ AND AM AWARE OF AND AGREE TO THE PROVISIONS OF MANTY'S CODE OF CONDUCT.

I UNDERTAKE TO COMPLY WITH IT IN FULL, INCLUDING WITH REGARD TO THE NON-DISCLOSURE OF INFORMATION, DURING AND AFTER THE TERM OF MY EMPLOYMENT CONTRACT.

FULL NAME:

DEPARTMENT:

ROLE:

**EMPLOYEE'S
SIGNATURE**

DATE



CODE OF CONDUCT

