

<b>SATIVA S.A.</b>			
 <b>Sativa</b> <small>OLIVE CULTURE</small>	<b>E-12.14 ETHICAL TRADING POLICY</b>		Issue 2 <sup>nd</sup>
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In our company SATIVA S.A., we recognize all the potential impacts of our commercial activities throughout the supply chain, but also the social impact of our production activities. As a socially responsible company, we know that suppliers, customers and society are expecting from us:

- All employees are treated with full awareness of basic human rights
- The company operates in an ethical manner, above and beyond basic legal requirements
- Our commitment to the proper implementation of ethical trading principles

#### **SATIVA S.A. ETHICS CODE**

Company SATIVA S.A., in response to current needs and expectations, but also wishing to ensure the highest level of working environment for all staff, implements faithfully all the requirements of the Code of ETI (Ethical Trading Initiative) Base Code, ensuring at least the following:

- ✓ Employment is freely chosen
- ✓ Freedom of association and the right to collective bargaining are respected
- ✓ Working conditions are safe and hygienic
- ✓ Child labour is not used
- ✓ Living wages are paid
- ✓ Working hours are not excessive
- ✓ No discrimination is practised
- ✓ Regular employment is provided
- ✓ No harsh or inhumane treatment is allowed
- ✓ Environmental management and protection
- ✓ Business ethics

#### *Relation of the company with workers*

*The relationship between the company and workers covered by the following fields:*

#### *Forced labor*

*The Company consists of people who work with their will and have duplicate contracts signed by both parties (workers, general director). Originals of passports, identity cards and other documents are in the hands of workers, the company retain the right to keep copies of them for 5 years. Employees have the right to stop work whenever they want after a valid notice. Also, they can leave the facility when they are outside working hours.*

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### *Working Legality*

*The Company employs legitimate workers (they have the legal right to work in the country) in compliance with the duty to provide evidence. All employees have social and health insurance, according to the legislation.*

*The company keeps a refreshed list of all its employees (permanent and seasonal).*

### *Payroll and licenses*

*Workers' salaries are determined by management as Greek law requires. No wage discrimination between employees. In overtime workers receive higher wages than the Greek legislation states, at 27% of normal wage. Each employee receives proof of his earnings and any deductions to be made. Finally, there is insurance coverage that ensures workers from accidents and injuries at work.*

### *Working hours and overtime*

*Working hours and overtime are determined and comply with legislation. Employees working 40 hours per week and overtime may not exceed two hours per day and 10 hours a week and their working hours are recorded. Overtime is not compulsory. All employees are entitled to at least one rest day a week. The breaks are at least 15 minutes of the hour for every 8 working hours (not counted as working time).*

### *Freedom of association and collective bargaining*

*Employees are free to join trade unions or other organizations of their choice. The company recognizes the right of collective bargaining with the majority of workers.*

### *Child Labor Prohibition*

*The Company complies with the requirements of Greek and Community legislation, clearly stating that they are against any forms of child labor. There are record files of the age of every employee.*

### *Anti-discrimination policy*

*The recruitment, salaries and employee promotions based on the policy of equal opportunities independently of sex, ethnicity, religion, marital status, sexual orientation, disability and health. So the workers who do the same job have equal pay. Pregnancy is not a factor not recruiting and not dismissed pregnant women up to 18 months postpartum.*

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### *Health and safety at work*

*The company gives priority to the health and safety of workers, believing that safe environment workers attach to the maximum. The company has all the resources required to maintain a high safety level and improve it. The health and safety at work complies with Community legislation. Yet the company is working with all those bodies (government or otherwise) that are intended to promote or improve health and safety conditions in the company. Employees often trained and are obliged to observe all necessary safety measures.*

### *Professional ethics code*

*The Company's activities are conducted with honesty, integrity and transparency, while respecting human rights and interests of workers. The staff and the company comply with existing Community and Greek legislation. The company shows the same respect to the legitimate rights of those who have a professional relationship with. The products offered to consumers are safe and offer value for money and quality terms. The labeling of the advertising and promotion of products aims to inform consumers without the mislead or conceal information. The company adopts all internationally recognized standards of good corporate practice. The relationship with suppliers, customers and partners are mutually beneficial to trade respected corporate principles.*

*All of the above have been evaluated by the senior management of the company and implemented to the entire personnel and constitute a continuous Management commitment.*

*Date: 22/01/2021*

*On Behalf of SATIVA S.A.  
CEO,*

*PANAGIOTIS PAPAGEORGIOU*