



**CODE OF ETHICAL CONDUCT  
AND ANTI-CORRUPTION POLICIES**  
**Suppliers**





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## **About us?**

***We are an Argentine Company with a vast experience in agribusiness management in the south of the Province of Buenos Aires.***

Alea is a Company whose main activity is the commercialization of grains and oilseeds and we focus our activities on the development of business and contracts on special products or of identity preserved, which involve the 50% of our transactions and an important contribution of value added in the production of our clients. Our honest compromise has positioned our Company in its leadership in both domestic and international trade.

We offer and provide services and programmed for rape, malting barley, bread wheat, high oleic corns and high oleic sunflowers. Other activities that we also perform are the provision of advice work, the sale of agrochemicals, fertilizers and seeds, storage and conditioning of grain, leaseholds for own sowing or for third parties, among other activities.

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## SUPPLIERS

### Selection

Employees must always make a responsible selection of suppliers. Some of the selection criteria include that suppliers comply with and communicate to their own supply chain the following standards related to workers' rights and respect for the environment.

### The Suppliers must comply with the following requirements:

- No use of child labor.
- Established occupational health and industrial safety policies and procedures.
- Respect for the right to free association.
- Respect for legal working hours.
- Payment of fair wages and benefits within legal parameters.
- Compliance with social security affiliation standards.
- Treatment of their workers with dignity and respect.
- No discrimination - in word or deed- against their workers for reasons of race, gender, language, religion, sexual orientation or disability.
- Compliance with established environmental standards.

### Concept

*For effects of this document, supplier is the third party that gives goods or services to the Company. It includes contractors, consultants and advisers.*

***The Company may request its suppliers to certify their compliance with the above and reserves the right to verify the information.***



## General principles

***The Suppliers must comply with the General Principles established by Alea & Cia and that are the foundations of this document.***

The Suppliers must act ethically. Ethics are an attitude towards doing business in the best possible way. This implies not only doing what is legal in a given situation but also doing what is ethically right and applying responsible business practices, without making concessions on our ethical principles.

The Suppliers and their employees must act with integrity, honesty and fairness in all aspects of their business relations, requiring the same from all those they interact with.

The Suppliers and their employees must not engage in activities that might lead to questioning of their integrity, impartiality or reputation. Suppliers and their employees must not only act ethically but must also be perceived to act ethically.

### **Purpose**

- Insist on an ethical approach towards business in line with the core values of Alea & Cia S.A.
- Apply the Alea & Cia S.A Code of Conduct in all business matters.
- Support the commitment of Alea & Cia S.A and abide its ethical principles.
- Maintain the highest ethical behavior standards in relation to Company business, colleagues, business partners, clients, suppliers, contractors, consultants, stakeholders and the community.

**Ethical behavior.  
Concept.**

*For the purpose of this document, Ethics are defined as doing the right thing in the right way, both in your personal life and in the business, with the following core principles:*

- Honesty and openness.
- Justice and fairness.
- Mutual respect and dignity.
- Accountability and responsibility.

***The overriding premise is that ethics involve a clear and conscious commitment of doing the right thing at all times.***



## ***Duties and mandatory practices***

### **Responsibility and accountability**

- Accept the responsibility and of being held accountable for actions and decisions.
- Be diligent in caring for and preserving the company resources that have been assigned to him/her in order to protect them from loss, theft or damage.

### **Truthfulness and fairness**

The Suppliers and their employees commit themselves to act according to the terms and principles of ethical behavior established in this Code of Conduct and Anti- corruption Policies and additionally they must comply with the following requirements:

- Act with integrity, impartiality, honesty and sincerity in all activities involving not only Alea & Cia but also their colleagues, business partners, clients, suppliers, contractors, stakeholders and the community.
- Act in all times in a manner that does not give rise to concerns or reproach.
- Treat everyone with dignity and respect, avoiding denigrating or making derogatory comments about them.
- Avoid any form of recrimination.
- Avoid misusing the power of the position held within the Company.



## Confidentiality

### Information of Alea & Cia S.A

It is possible that Suppliers in the course of their business relation with the Company have access to sensitive and/or confidential information. Trade secrets will be treated as property of Alea & Cia S.A. They are usually in the form of information, knowledge or know how. It is, what is not generally of public domain and which possession gives the owner some advantage over competitors who do not possess this information. A secret need not be patentable to qualify as a trade secret.

Information that belongs to Alea & Cia S.A, whether or not it is a secret or confidential, must remain within the Company and must be protected as a valuable asset. Because of the responsibilities of the position, it may only be disclosed due to legal requirements or by Company policies and always with the prior and written consent of the Company.

When a third party, colleague or a friend asks a Supplier and/or one of their employees for information that is not considered confidential, but is not public either, disclosure must be approved by the General Manager of Alea & Cia.

### ***Suppliers' obligations with respect to propriety and trade secret information of the company include:***

- Not to disclose information to third parties except when authorized expressly.
- Not to use this information for personal or third parties benefit.
- Not to negotiate with confidential information.

***When Suppliers cease having business with the Company, their legal obligation to protect Alea & Cia 's trade secrets and proprietary information continues.***