



ENVIRONMENTAL POLICY

The Jaguar Group – through its international fresh produce sourcing and marketing activities – is committed to all forms of environmental awareness, and expects its supply partners to show environmental leadership in all of their business activities. As we do with our own company, we expect the policies and business practices of our agricultural supply partners to be focused on ensuring a safe, healthy workplace, protecting the environment, and conserving energy and natural resources. With these policies in place the Jaguar Group believes that as far as possible, taking into account our span of control, we and our supply partners can collectively ensure a healthy and safe environment.

As a company, we are committed to the following policies and procedures. In the same vein, we expect supply partners to follow the same set of rules and policies. This is to:

- Provide a safe and healthful workplace and ensure that personnel are properly trained with the appropriate safety and emergency equipment, and have extensive knowledge of our environmental policies and procedures.
- Be an environmentally responsible neighbor in the community/communities where we operate, and correct incidents or conditions that endanger health, safety, or the environment.
- Conserve natural resources by adopting pollution prevention practices. For example: extending the life of equipment through preventive maintenance scheduling, purchasing and reworking used equipment.
- Develop and improve operations and technologies to minimize emissions, waste and other pollution, minimize health and safety risks, and dispose of waste safely and responsibly.
- Ensure the responsible use of energy throughout our businesses, including conserving energy, improving energy efficiency, and giving preference to renewable over non-renewable energy when feasible.
- Participate in efforts to improve environmental protection and understanding. By this we mean sharing appropriate pollution prevention technology, knowledge and methods with other stakeholders.
- Utilize academic and regulatory organisations (such as ministries of agriculture and export control boards) to assist in the development of solutions of environmental problems. We promote cooperation and understanding with such public and government agencies in developing economically feasible and environmentally sound waste water treatment objectives.
- Meet and exceed all applicable (local) governmental requirements, and adhere to local requirements no matter where we do business.
- Strive to continually to improve our environmental management system and performance;
- Promptly report all noncompliance issues in accordance with applicable governmental reporting requirements, evaluate causes of noncompliance, and implement corrective actions.
- Establish procedures for periodic review of environmental compliance with all laws and regulations wherever we operate.
- Establish procedures to ensure all that employees are knowledgeable of, understand and comply with all applicable environmental laws and regulations.
- Promptly correct any practice or condition not in compliance with this policy.



CORPORATE GOVERNANCE, DILIGENCE AND CORPORATE INTEGRITY POLICY

We believe that companies exist not only as economic entities designed to pursue profits through fair competition, but also as social entities which must make a contribution to society at large.

We are expected to respect human rights and to conduct our ourselves in a socially responsible manner toward the creation of a sustainable society, observe both the spirit as well as the letter of all laws and regulations applying to their activities both in The Netherlands and abroad in accordance with the following eleven principles.

1. By supplying products and services in a safe and responsible manner, we shall strive to earn the confidence of consumers and customers, while taking necessary measures to protect personal data and customer related information.
2. We shall promote fair, transparent, free competition and sound trade. We shall also ensure that our relationships and contacts with government agencies and political bodies are of a sound and proper nature.
3. We shall engage in communication not only with shareholders but also with members of society at large, including active and fair disclosure of corporate information.
4. We shall strive to respect diversity, individuality and differences of our employees, promote a safe and comfortable workplaces, and ensure the mental and physical well-being of our employees.
5. We shall recognize that a positive involvement in environmental issues is a priority for all humanity and is an essential part of our activities and our very existence as a company, and we shall therefore approach these issues proactively.
6. As "good corporate citizens," we will actively engage in philanthropic activities, and other activities of social benefit.
7. We shall reject all contacts with organizations involved in activities in violation of the law or accepted standards of responsible social behavior.
8. We shall observe the laws and regulations applying to our overseas activities and respect the culture and customs of other nations and strive to manage our overseas activities in such a way as to promote and contribute to the development of local communities.
9. Our management shall assume the responsibility for implementing this charter and for taking all necessary action in order to raise awareness in the group, and inform our group companies and business partners of their responsibility.
10. Our management shall heed the voice of our stakeholders, both internally and externally, and promote the development and implementation of systems that will contribute to the achievement of business ethics.
11. In the case of incidents contrary to the principles of this policy, our management will investigate the cause for the incident, develop reforms to prevent recurrence, and make information publicly available regarding their intended actions for reform. After the prompt disclosure of information regarding the incident, responsibility for the event and its effects will clarified and disciplinary action taken, including the highest levels of management where necessary.



SOCIAL PROJECTS ENGAGEMENT POLICY

The Jaguar Group bases its approach to social projects on many years of experience in being involved in a variety of social projects in different countries. The following 5 rules apply whenever new projects are suggested by stakeholders.

Our focus for social are based on the following guidelines.

1. We focus on projects where there are spinoffs possible for the broader community, as opposed to individuals.
2. We only do projects if there is definite support for it locally, specifically at grass roots level.
3. We focus on 'people development', as opposed to making investments in bricks and mortar.
4. In the first instance, projects must always lead to increased social harmony. Economic benefits can follow, but it is not a prerequisite.
5. We demand sound administration and adherence to financial integrity.

We believe that our successes are due to our process of being in touch with locals wherever we implement social projects. In this, we follow these guidelines.

1. We involve all those with an interest in the project and we assist them in defining exactly what they would ideally want a project to achieve;
2. We use creative approaches to engage with people and organizations, in other words, we do not limit ourselves to text-book approaches;
3. We believe that our projects must be more accountable and beneficial to the wider community, hence we engage as many stakeholders as possible;
4. We refrain from projects where 'local officialdom' wants to take the lead. Instead, we focus on projects which are driven by a collection of individuals; and
5. We involve the entire community in celebrating successes and achievements.

On an ongoing basis, we focus on:

1. Learning from our experiences;
2. Recording what we have learnt, and sharing it with our stakeholders;
3. Checking our progress to see if we are still on track with our objectives;
4. Ensuring that our actions are in line with our core values;
5. Checking whether what we are doing is still what local people want or need;
6. Identifying the (changes in) our strengths and weaknesses in our project and adapting it to the conclusions;
7. Using information continuously to create a basis for future planning;
8. Demonstrating to ourselves and our stakeholders whether we have used our resources – time and money – effectively;
9. Explaining to funders, and others involved in our work, what we have achieved and to what extent it is successful; and
10. Using our corporate communication skills to inspire our stakeholders to either become involved in our projects, or to initiate their own social projects.



SUPPLIER CSR CODE OF CONDUCT (BRIEF)

For ensuring its position as a responsible business partner in terms of ethical, social and environmental issues this Code of Conduct summarises the aspects to which the Jaguar Group is committed, and which the Jaguar Group requires its suppliers to commit to. These requirements are prepared in accordance with the principles of the UN's Global Compact.

Compliance with legislation

Supplier shall comply with current national legislation and regulations.

Environment

Supplier shall comply with the principles in the UN's Global Compact concerning the environment. Supplier has identified the principal environmental effects of its operations and shall work to reduce emissions into the air, soil and waterways and make efficient use of resources.

Business ethics

All forms of bribery, money laundering, corruption and unlawful trade practices are strictly prohibited.

Working environment and social conditions

Supplier is obliged to support and respect international declared human rights and treat its employees fairly, equally and with respect. Supplier shall at least follow and comply with the minimum standards according to local laws and regulations regarding the working environment. Accidents and work-related injuries have to be prevented.

Freedom of association

Supplier shall respect its employees' right to form or join unions as well as the right to collective negotiations.

Working hours and wages

Supplier complies with national legislation and agreements concerning the working hours and overtime is not demanded on a regular basis. Wages, benefits and overtime compensation shall at the very least comply with national legislation and agreements. Any deduction from wages as a disciplinary measure is prohibited.

Forced labour and child labour

- No form of forced labour or labour linked to any form of punishment is permitted.
- No employee may be forced to hand over valuables or identification papers to his/her employer.
- The Jaguar Group does not accept child labour. Every child is to be protected from economic exploitation and from carrying out work that can be considered dangerous, to have a negative effect on the child's education or to be harmful to child's health or development.

- The term 'child labour' refers to work carried out by a child who is under 15 years of age, or under 14 years of age in those countries specified in Article 2.4 of ILO Convention 138.

Discrimination and oppression

The Jaguar Group does not accept discrimination, oppression, threats, harassment or insults in any form.

Follow-up and enforcement

Enforcement of this Code of Conduct by Supplier is a matter of high importance for the Jaguar Group's business. It is Supplier's responsibility to ensure that this Code of Conduct is implemented. The Jaguar Group reserves the right to make inspections to ensure that this Code of Conduct is being enforced. These inspections may be performed by an independent third party and may be unannounced.



GROWER CODE OF CONDUCT (COMPREHENSIVE)

Freedom of Association and the Right to Collective Bargaining

- All personnel shall have the right to form, join, and organise trade unions of their choice and to bargain collectively on their behalf with the company.
- The company shall respect this right, and shall effectively inform personnel that they are free to join an organisation of their choosing and that their doing so will not result in any negative consequences to them, or retaliation, from the company.
- The company shall not in any way interfere with the establishment, functioning, or administration of such workers' organisations or collective bargaining.
- In situations where the right to freedom of association and collective bargaining are restricted under law, the company shall allow workers to freely elect their own representatives.
- The company shall ensure that representatives of workers and any personnel engaged in organizing workers are not subjected to discrimination, harassment, intimidation, or retaliation for reason of their being members of a union or participating in trade union activities, and that such representatives have access to their members in the workplace.

Prohibition of Discrimination

No discrimination shall be tolerated in hiring, remuneration, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in workers' organisations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other condition that could give rise to discrimination.

Compensation

Wages paid for regular working hours, overtime hours and overtime differentials shall meet or exceed legal minimums and/or industry standards.

- Illegal, unauthorised or disciplinary deductions from wages shall not be made. In situations in which the legal minimum wage and/or industry standards do not cover living expenses and provide some additional disposable income, supplier companies are further encouraged to provide their employees with adequate compensation to meet these needs.
- Deductions from wages as a disciplinary measure are forbidden, unless this is permitted by national law and a freely negotiated collective bargaining agreement is in force.
- Supplier companies shall ensure that wage and benefits composition are detailed clearly and regularly for workers; the supplier company shall also ensure that wages and benefits are rendered in full compliance with all applicable laws and that remuneration is rendered in a manner convenient to workers.
- All overtime shall be reimbursed at a premium rate as defined by national law. In countries where a premium rate for overtime is not regulated by law or a collective bargaining agreement, personnel shall be compensated for overtime at a premium rate or equal to prevailing industry standards, whichever is more favourable to workers' interests.

Working Hours

- The employer shall comply with applicable national laws and industry standards on working hours and public holidays.
- The maximum allowable working hours in a week are as defined by national law but shall not on a regular basis exceed 48 hours and the maximum allowable overtime hours in a week shall not exceed 12 hours.
- Overtime hours are to be worked solely on a voluntary basis and to be paid at a premium rate.
- In cases where overtime work is needed in order to meet short-term business demand and the company is party to a collective bargaining agreement freely negotiated with worker organisations (as defined above) representing a significant portion of its workforce, the company may require such overtime work in accordance with such agreements.
- Any such agreement must comply with the requirements above. An employee is entitled to at least one free day following six consecutive days worked. Exceptions to this rule apply only where both of the following conditions exist:
 - National law allows work time exceeding this limit; and
 - A freely negotiated collective bargaining agreement is in force that allows work time averaging, including adequate rest periods.

Workplace Health and Safety

- The employer shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to workers' health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the workplace environment, and bearing in mind the prevailing knowledge of the industry and of any hazards.
- A clear set of regulations and procedures must be established and followed regarding occupational health and safety, especially the provision and use of personal protective equipment, access to clean toilet facilities, access to potable water and if appropriate, sanitary facilities for food storage shall be provided.
- The employer shall ensure that any dormitory facilities provided for personnel are clean, safe, and meet the basic needs of the personnel.
- All personnel shall have the right to remove themselves from imminent serious danger without seeking permission from the company.
- Workplace practice and conditions in dormitories which violate basic human rights are forbidden.
- In particular young workers shall not be exposed to hazardous, unsafe or unhealthy situations.
- A management representative responsible for the health and safety of all personnel and accountable for the implementation of the Health and Safety elements shall be appointed.
- All personnel shall receive regular and recorded health and safety training, moreover, such training shall be repeated for new and reassigned personnel.
- Systems to detect, avoid or respond to potential threats to health and safety of all personnel shall be established

Prohibition of Child Labour

- Child labour is forbidden as defined by ILO and United Nations Conventions and/or by national law. Of these various standards, the one that is the most stringent shall be followed.

- Any forms of exploitation of children are forbidden.
- Working conditions resembling slavery or harmful to children's health are forbidden.
- The rights of young workers must be protected.
- The employer may employ young workers, but where such young workers are subject to compulsory education laws, they may work only outside of school hours.
- Under no circumstances shall any young worker's school, work, and transportation time exceed a combined total of 10 hours per day, and in no case shall young workers work more than 8 hours a day.
- Young workers may not work during night hours.

Prohibition of Forced and Compulsory Labour and Disciplinary Measures

- All forms of forced labour, such as lodging deposits or the retention of identity documents from personnel upon commencing employment, are forbidden as is prisoner labour that violates basic human rights.
- Neither the company nor any entity supplying labour to the company shall withhold any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.
- Personnel shall have the right to leave the workplace premises after completing the standard workday, and be free to terminate their employment provided that they give reasonable notice to their employer.
- Neither the employer nor any entity supplying labour to the employer shall engage in or support trafficking in human beings.
- The employer shall treat all personnel with dignity and respect. The employer shall not engage in or tolerate the use of corporal punishment, mental or physical coercion and verbal abuse of personnel.

Environment and Safety Issues

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment must meet or exceed minimum legal requirements.

Management Systems

- The employer shall define and implement a policy for social accountability.
- Management is responsible for the correct implementation and continuous improvement by taking corrective measures and periodical review of the Code of Conduct, as well as the communication of the requirements of the Code of Conduct to all employees.
- Management shall address employees' concerns of non compliance with this Code of Conduct.



ANTI-CORRUPTION POLICY

Corruption is the abuse of entrusted power for private and usually commercial gain. The Jaguar Group takes a zero-tolerance approach to corruption and is committed to carrying out business fairly, honestly and openly, and without improper influence. The Jaguar Group does not, either directly or indirectly, through intermediaries or other third parties, solicit, receive, offer, promise or provide any financial or other advantage of material value or otherwise exercise improper influence in its dealings with other businesses, or with government or public officials with the intention of obtaining any improper advantage in the conduct of its business. All employees are required to comply with this policy and are responsible for ensuring that the Jaguar Group business is undertaken with the utmost integrity with regard to the following matters:

Fraud and extortion

Fraud and extortion are criminal offences. The Jaguar Group prohibits the direct or indirect demand for or acceptance of any advantage, through deception or otherwise, which is used for an employee's or The Jaguar Group's benefit.

Bribery

Bribery is unlawful in all countries in which The Jaguar Group operates. The Jaguar Group prohibits all forms of bribery. Bribery is the direct or indirect offering, promising, giving, accepting or soliciting of a financial or other advantage that results in an activity being performed improperly (for example in breach of trust, in bad faith or in a biased manner). The advantage may have been offered or received, or the improper performance undertaken, directly or indirectly (for example, via a customer, agent, intermediary or supplier). The improper activity may be connected with The Jaguar Group's business (including the activity of employees or third parties working on behalf of The Jaguar Group) or with the functions of government or other public bodies.

Facilitation payments

The Jaguar Group prohibits facilitation payments. A facilitation payment is payment of a bribe to a government or public official to secure or expedite the performance of a routine action to which the payer is entitled. The Jaguar Group recognises that there may be circumstances in which an official immediately threatens or compromises the personal safety and security of an individual concerned (or another) in order to procure the payment. In such situations, any payment must be reported in accordance with the relevant procedures.

Gifts, entertainment (hospitality) and expenses

The Jaguar Group recognises that fostering good relationships with business partners is important to its continued success. The provision and receipt of modest gifts and entertainment, and the incurring of modest expenses, are acceptable in principle provided that they are reasonable and made transparently.

However, the provision or receipt of any gift or entertainment, or the incurring of any expenses, is not permitted where it is offered or received in exchange for a business or other improper benefit, creates (or may create) any sense of “obligation”, influences (or could influence, in any way) business judgement or creates (or may create) a conflict between an employee’s personal interests and those of The Jaguar Group or is otherwise illegal. Any activity that could be perceived as having any of the above effects is also prohibited.

The Jaguar Group’ business decisions and those of its partners must be made (and be seen to be made) objectively and without influence by gifts or favours. Employees may only offer or accept corporate or personal gifts of a modest value. In all circumstances, gifts, entertainment and other expenditure must be subject to an appropriate disclosure process and gifts, entertainment and expenditure above a specified value must be subject to an appropriate (prior) approval process. It is anticipated that values will vary according to the jurisdiction concerned.

Third parties

The Jaguar Group is aware that its reputation may be damaged by the conduct of third parties acting on its behalf or by others with which it does business. In certain circumstances, their actions can have legal implications for The Jaguar Group. As such, it is not acceptable for a third party acting on the Jaguar Group’ behalf to act in a way which would breach this policy were the act in question undertaken by the Jaguar Group directly. The Jaguar Group is therefore committed to (a) taking reasonable steps to ensure that its business partners are made aware of, understand and adhere to this policy (and, where relevant, its associated procedures); (b) verifying the integrity and reputation of its business partners through appropriate and reasonable due diligence in light of perceived levels of risk; and (c) (where appropriate and possible) putting in place appropriate and reasonable controls to monitor the use of The Jaguar Group ’ money by third parties acting on the Jaguar Group ’ behalf.

Interaction with government officials and lobbying

The Jaguar Group does not, directly or indirectly through intermediaries or other third parties, offer, promise or provide any financial or other advantage or otherwise seek to exercise improper influence in its relations with government or public officials in order to obtain any improper advantage.

Charitable contributions and sponsorships

The Jaguar Group makes charitable contributions and offers sponsorships for the purposes of socio-economic development or linked to cultural or sporting activities and not for improper business purposes. Charitable donations and sponsorships must not be perceived as being given for improper purposes. When a charitable contribution or sponsorship is proposed, it must be transparent, documented, made in accordance with applicable law and assessed for compliance with this policy and any related procedures.

Political donations

The Jaguar Group does not participate directly or indirectly in party politics and does not usually make payments to political parties, politicians or related organisations. In exceptional circumstances, donations may be made, with the approval of the Jaguar Group’s Managing Director, in support of the democratic processes in the country where the donation is being made. Political donations must be made only to pro-democratic registered parties that are committed to the protection of human rights, good governance and the rule of law. In such cases, proposed payments must be made in a transparent manner with adherence to the above criteria.

The Jaguar Group respects the right of employees to participate in the political process. When pursuing such activities, employees must ensure that their views are not identified as those of the Jaguar Group.

Use of company assets

Employees have a responsibility to protect the Jaguar Group's assets from theft, loss, abuse, unauthorised use or disposal.

They must use company assets only for purposes related to conducting their the Jaguar Group responsibilities and may use company assets for other (including personal) uses only when properly authorised.

Conflict of interest

Employees must avoid conflicts of interest and are expected to perform their duties conscientiously, honestly and in accordance with the best interests of the Jaguar Group. Employees must not abuse their position, misuse confidential knowledge for personal or third party gain, or have any direct involvement in any business interest which diverts their attention from, or is in conflict with, the JaguarGroup's commercial interests, or which in anyway compromises their independence and impartiality.

Mergers, acquisitions and joint ventures

The Jaguar Group is committed to undertaking appropriate and reasonable due diligence on the reputation and integrity of any business in which it invests.

Reporting ("Whistle blowing")

A confidential and secure means for employees and other relevant stakeholders to report conduct that may be contrary to the JaguarGroup's values and principles, including conduct that may breach this policy (or its associated procedures), is established through the availability of a direct communication channel with the shareholders of the Jaguar Group or the board of directors of the Jaguar Group (the so-called "whistle blowing" facility). The Jaguar Group does not tolerate any form of retaliation, harassment or intimidation of an employee by others as a result of raising concerns through the facility in good faith. All concerns will be investigated and appropriate action taken.

Breaches of this policy

It is the responsibility of all employees to report any breaches, or potential breaches, of this policy to the managing director or any other shareholder to whom they report or through the whistle blowing facility. Violations of this policy, including involvement in any corrupt activities and failure to report actual or potential breaches of this policy (or its associated procedures), will lead to disciplinary action. In some circumstances, failure to report actual or suspected violations of this policy may itself constitute a legal offence. The Jaguar Group is committed to reporting all instances of corruption and other forms of dishonesty to the relevant authorities and to facilitating criminal action against the individuals concerned where appropriate.



HUMAN RIGHTS POLICY

The Jaguar Group is committed to integrating human rights best practices into our business processes and to inform our decision-making and due diligence processes. Our human rights policy mandates that we operate in a way that respects the human rights of all employees and the communities in which we operate our business. This policy recognizes that while governments have the primary responsibility to protect human rights, our activities have the potential to impact the human rights of individuals affected by our business operations.

We are committed to continual improvement in the area of human rights, and to that end, we seek constructive dialogues and partnerships with a variety of stakeholders on our human rights performance, especially those impacted directly by our operations.

To meet our responsibilities to respect human rights, the Jaguar Group makes the following commitments:

1. All our employees will uphold and respect the human rights set forth in the Universal Declaration of Human Rights and international humanitarian law.
2. We respects the rights and dignity of employees, contractors, and local communities and we are committed to providing equal opportunity and freedom from discrimination for all.
3. We respects workers rights, including freedom of association, the right to peaceful protest and assembly, and engagement in collective bargaining in association with the International Labor Organization (ILO) conventions on organizing and collective bargaining.
4. We respect the rights and traditions of indigenous peoples in association with ILO Convention 169 and seeks to protect cultural and spiritual heritage as well as the environment.
5. We support the elimination of all forms of forced, compulsory and child labour.
6. Where we – or any of our suppliers - hire private security forces to protect employees, contractors, partners, resources, and company property, the contractors will be required to comply strictly with local and international law and with the Voluntary Principles on Human Rights and Security.
7. We will work to minimize involuntary resettlement of workers wherever possible.
8. All employees of the JaguarGroup will receive information regarding our Human Rights Policy & Code of Conduct.
9. We are committed to continual improvement of the human rights standards and practices of our suppliers, and to that end we will regularly review and assess the effectiveness of and their compliance with international human rights standards.
10. We will take appropriate measures to ensure that contractors and partners respect this policy.
11. Our commitment to respect human rights also is supported by our Corporate Governance & Corporate Integrity Policy.

12. Our commitment to respect human rights is formed by various international laws, from which we have compiled our Code of Conduct for Human Rights. This code applies to our own operations worldwide. The laws which apply are as follows:

- ILO Convention 29 on Forced or Compulsory Labour
- ILO Convention 87 on Freedom of Association and Protection of the Right to Organize
- ILO Convention 98 on Right to Organize and Collective Bargaining
- ILO Convention 100 on Equal Remuneration
- ILO Convention 105 on Abolition of Forced Labour
- ILO Convention 111 on Discrimination (Employment and Occupation)
- ILO Convention 138 on Minimum Age
- ILO Convention 169 on Indigenous and Tribal Peoples
- ILO Convention 182 on Worst Forms of Child Labour
- International Convention on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- Organization for Economic Co-operation and Development Guidelines
- Report of the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises (John Ruggie)
- Voluntary Principles on Security and Human Rights
- United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials
- United Nations Code of Conduct for Law Enforcement Officials