CORPORATE ENVIRONMENTAL POLICY

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# Objective of this policy

# When we founded Agromillora Group, we embraced certain values which have always been part of our culture. These values remind us that our work is a contribution to the nursery and agricultural sector, and that our commitment, our cause and our objectives are focused on the growth and improvement of our company, our customers, our collaborators but also the planet itself.

At Agromillora we understand that business ethics, compliance with regulations, and respectful conduct with people and the environment in which we operate, are essential for a sustainable business growth.

For the reasons above, we considered also in our Code of Ethics and Conduct, in its point 7.10, our commitment to the planet and the environment, as stated below:

“**ENVIRONMENTAL PROTECTION:** Our business activity and our environment are related to nature and plant species, which reinforces our involvement in protecting nature and the environment. We are committed to complying with regulations related to the defence of the environment in the regions or countries in which we operate.”

**The objective of this Corporate Environmental Policy is to issue a clear statement from our intentions and principles in relation to our overall environmental performance, providing a framework for action and for the setting of our environmental objectives and targets.**

# Policy Scope and Organization context

The scope of this policy covers all operations and staff in all the worldwide Agromillora sites, including Headquarters, laboratories, nursery facilities, warehouses …, considering both normal and emergency/abnormal operational situations.

We will consider not only our own operational boundaries but also the Life cycle of our products and services upstream and specially downstream, taking into consideration our activity has a significant and long term impact in the fruit agriculture sector.

A materiality assessment and key stakeholders identification process is needed in order to identify relevant topics and stakeholders needs and expectations for defining a complete Organization context

# Definitions

**Stakeholder:** entity or individual that can reasonably be expected to be significantly affected by the reporting organization’s activities, products and services, or whose actions can reasonably be expected to affect the ability of the organization to successfully implement its strategies and achieve its objectives.

**Environment:** surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships.

**Environmental aspect:**  element of an organization's activities or products or services that interacts or can interact with the environment.

**Environmental impact**: change to the environment, whether adverse or beneficial, wholly, or partially resulting from an organization's environmental aspects.

**Environmental objective:** overall environmental goal, consistent with the environmental policy, that an organization sets itself to achieve.

**Prevention of pollution:** use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts.

**Compliance obligations**: legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with.

**Risks and opportunities**: potential adverse effects and potential beneficial effects

**Life cycle**: consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.

**Process:** set of interrelated or interacting activities which transforms inputs into outputs.

**Audit**: systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled

**Nonconformity**: non-fulfilment of a requirement

**Corrective action:** action to eliminate the cause of a nonconformity and to prevent recurrence.

**Continual improvement**: recurring activity to enhance performance.

# Responsibilities & Leadership

Top management should ensure that the responsibilities and authorities for relevant roles within the environmental management are assigned and communicated at all levels within the organization and maintained as documented information.

The environmental organizational roles, responsibilities and authorities follow the below structure:

1. **Sustainability Steering Committee:** At corporate level, this committee is responsible for developing, implementing, and reporting all policies, aspects, projects & initiatives, and objectives related to Environment performance of the organization.
2. **Corporate Sustainability Director**: At Corporate level, this senior management position is responsible for leading the Environmental function, leading the Sustainability Steering Committee and ensuring all key requirements are considered and all targets, projects and initiatives are on track and covering all corporate and material topics, being prioritized and fulfilled. Needs to ensure Environmental Performance is reported to Top Management, (Executive Board – Corporate Management Committee)
3. **Subsidiaries and Regional Management**: For each region and subsidiary, specific top management is responsible to ensure the right deployment of the Environmental corporate policies, processes projects and initiatives according to the corporate plan. Also are responsible to ensure the definition and achievement of site Environmental Objectives, targets and goals.
4. **Subsidiaries Environmental Management:** For bigger subsidiaries & sites, specific environmental management and other area responsible may be appointed to develop the environmental function and tasks.
5. **Risk Management:** A corporate risk management responsible is appointed in order to coordinate all company risks and opportunities, including also the ones related to:
   1. **Environmental Aspects**
   2. **Compliance Obligations**
   3. **Other requirements**

The main objective is to support the achievement of Environmental Objectives, to prevent and mitigate environmental risks and to promote continual improvement.

1. **Communication**: Internal and external communication are key to handle and sharing environmental relevant information. Corporate and subsidiaries Marketing and communication and in some cases HR teams will be responsible to lead this function.
2. **Training and education**: Relevant training and education processes are needed to ensure a correct level of knowledge, consciousness and education about key Environmental aspects and objectives. Corporate and subsidiaries HR will lead this function.
3. **All Employees**: Every single employee and staff member is responsible to carry out their duties in a resource efficient way and actively respecting and supporting the environmental policy, procedures, and objectives as a part of their daily role.

# Policy Content

**Introduction**

In order to achieve the objective of this policy, it is needed to determine the material topics that are relevant to Agromillora. The materiality assessment is the reference to identify all corporate material topics. This needs to be reviewed if significant operational, product or market changes occur within the company.

The organization show the commitment with relevant environmental performance indicators and what projects and initiatives applies to implement and achieve those commitments in a timeframe and geographical extension. Those projects and initiatives are allocated to key responsible positions or committees.

This policy will be reviewed annually in a Sustainability Steering committee to ensure an updated and accurate status, and at any time if operational, products or market significant changes occur.

The policy will be publicly accessible and endorsed by senior management.

**Policy commitments**

* **The Senior Management of the organization is fully committed with the purpose of this policy.**
* **This Corporate Environmental Policy is appropriate to our purpose and organizational context.**
* **We at Agromillora are committed to develop Environmental projects, initiatives, and objectives in all our relevant operations including external (upstream and downstream) and our own internal ones.**
* **We are engaged as Participant of the United Nations Global Compact, fully supporting the Sustainable Development Goals.**
* **We have the determination to lead continual improvement to enhance our corporate environmental performance, considering the following specific commitments:**
  + **To Protect the Environment and giving special considerations to:**
    - **Climate Change**
    - **Responsible water management**
    - **Biodiversity and Genetics**
    - **Responsible Consumption of Energy & Natural Resources**
    - **Circular Economy (waste)**
    - **Pollution**
    - **Any other material topic identified by key internal and external stakeholders**
  + **To fulfil legal and compliance obligations**
* **To identify and provide the required resources for managing Environmental Performance and commitments**
* **To achieve the right level of workers Environmental competences and consciousness by providing appropriate training and education.**
* **To review the Environmental performance annually by senior management.**
* **The policy will be reviewed by top management in case of substantial change of company context, relevant requirements, or material topics.**

# References

Key references considered to issue this policy:

1. ISO 14001:2015 Environmental management systems — Requirements with guidance for use
2. Ecovadis How-to Guide . Developing an Environmental Policy V.2 EN
3. Agromillora Code of Ethics & Conduct (2018-2019)
4. Agromillora Quality Policy (2020)

# 6. Anexs

# Materiality Assessment 2021