



CALAVO GROWERS, INC.

SUPPLIER CODE OF CONDUCT

(English version)

INTRODUCTION

Calavo Growers, Inc., including its subsidiaries and affiliates, (collectively “we”, “Calavo”, or the “Company”) conducts its business honestly and ethically wherever we operate. We strive to improve the quality of our services, products and operations, and we maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment. No illegal or unethical conduct on the part of our directors, officers, employees or suppliers is permitted. Calavo will not compromise its principles. The honest and ethical performance of Calavo is the sum of the ethics of its team members. Accordingly, all directors, officers, employees and suppliers are expected to adhere to the highest standards of ethical business practices and personal integrity.

1. APPLICABILITY

We expect all suppliers to share the principles expressed in this Supplier Code of Conduct (“SCOC”) because the understanding of and adherence to the SCOC are important components of our supplier evaluation and selection process. Calavo management and suppliers have the responsibility to report exceptions to this policy as defined in Section 8 of this SCOC.

2. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Compliance with all laws is the baseline of Calavo’s ethical standards. All directors, officers, employees and suppliers must comply with the laws of the countries in which we operate.

3. BRIBES, KICKBACKS AND GIFTS; FOREIGN CORRUPT PRACTICES ACT

No bribes, kickbacks or other similar remuneration or consideration may be given to any person or organization in order to attract or influence business activity. The United States Foreign Corrupt Practices Act (“Act”) prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. Therefore, our SCOC strictly prohibits making illegal payments to government officials of any country. These prohibitions apply to conduct anywhere we operate and apply to our officers, directors, employees, suppliers and agents (which can include consultants, distributors, and joint venture partners). Anti-corruption laws may subject a person or an entity to a separate offense for failing to keep accurate records of business transactions, so you should ensure that all relevant records—including invoices—accurately reflect the associated business transactions. If you are aware of any violations or possible violations of the Act, please report your concern using the methods identified in Section 8 of this SCOC.

Calavo’s directors, officers and employees are also prohibited from receiving gifts, gratuities, fees or bonuses as an



inducement to attract or influence business activity. No entertainment should ever be offered by a supplier to any Calavo director, officer or employee (or any family member of any such person) in connection with our business activities unless it: (a) is consistent with customary business practices; (b) is not excessive in value; (c) cannot be construed as a bribe or payoff; and (d) does not violate any laws or regulations.

4. LABOR AND HUMAN RIGHTS

We expect our suppliers (as well as their suppliers and sub-contractors) to lawfully conduct their respective businesses ethically, with integrity, and to protect the human rights of their employees, including treating them with dignity and respect. This includes but is not limited to:

- prohibiting the use of forced labor and child labor;
- preventing harassment, abuse and violence in the work environment; ensuring a non-discriminatory work environment; prohibiting discrimination and harassment based on age, race, color, sex, sexual orientation and gender identity, religion, national origin, ethnicity, trade union membership, disability, pregnancy, family status, or any other legally protected status;
- ensuring a safe and healthy work environment;
- permitting freedom of association and collective bargaining as allowed by local law;
- providing at least the minimum wage and benefits required by law and following local labor regulations where the supplier does business;
- compensating employees in line with local regulations and law;
- ensuring working hours do not exceed the maximum set by applicable law; and
- operating in strict compliance with all applicable laws and regulations in effect where the supplier does business.

Calavo prohibits any form of forced labor, including human trafficking and slavery. If any form of forced labor, including human trafficking and slavery is found in our supply chain, Calavo may take action upon discovery, including immediate remediation, possible termination of the business relationship, and may subject the violator to criminal prosecution.

5. OCCUPATIONAL SAFETY

Calavo expects our suppliers to have a comprehensive worker safety program. The program is to be properly planned, developed, and implemented. The program should include a training program for both supervisors and employees, worker participation, periodic communication, hazard risk assessment, emergency preparedness and response, performance monitoring and measurement, and investigation of work-related injuries. The organization should strive for continual improvement.



6. ENVIRONMENTAL IMPACT

Calavo expects its suppliers to minimize their operation's impact on the environment. Suppliers should be specifically committed to:

- compliance with all applicable environmental regulations;
- preventing pollution whenever possible;
- the conservation of natural resources through careful planning and efficient use of water, energy, raw materials, and supplies;
- the minimization of waste through source reduction, reuse, recycling, and composting;
- the handling and disposing of waste through safe and environmentally sustainable methods;
- responsible handling of all chemicals and hazardous materials, including wastewater and solid water generated from operations, including ensuring proper handling and disposal using environmentally sound practices; in the event hazardous or polluting materials are discharged improperly, appropriate authorities will be notified, and immediate action taken to correct and remediate; and
- the prevention of pollution, including greenhouse gases, and unintended release of substances that may cause harm to air, water or land.

7. SUPPLY CHAIN AUDITS

Calavo, at its discretion, may conduct or hire a third party to conduct a supply chain audit. This audit may consist of auditing for compliance with this SCOC, including but not limited to product safety, environmental impact, and environmental management. We expect our suppliers to cooperate with the personnel assigned to conduct such audit.

8. REPORTING CONCERNS; COMPLIANCE PROCEDURES

Understanding and acting upon any issues that exist regarding financial, accounting, audit, or other matters are essential components in our ability to act and ensure integrity throughout our operations. Suppliers are required to promptly report any unethical, dishonest, or illegal behavior, any concerns regarding the company's internal accounting controls or auditing matters, or any other violation of this SCOC or of other Calavo policies and procedures. A confidential report can be made by calling 1-888-279-6251 from the U.S. (in English or Spanish) or 001-800-840-7907 from Mexico (in Spanish or English), or online at www.ethicspoint.com. Any report filed over the phone or online will be reviewed by our internal audit and legal teams, President/CEO and/or our audit committee.

Calavo does not permit retaliation for a report of unethical, dishonest or illegal behavior, or of any other violation of this SCOC or any other Calavo policy and procedure. If a supplier is found to be in non-compliance with this SCOC, Calavo may act upon discovery, including immediate remediation, possible termination of the business relationship and/or subject the violator to criminal prosecution.