



Ethics and Corporate Governance



[BACK TO TABLE OF CONTENTS](#)



At Grupo Lucci, we contribute to achieving SDG 16, which promotes peaceful and inclusive societies for sustainable development, access to justice and the creation of effective, accountable and inclusive institutions. For this reason, we aim at aligning with the highest standards in terms of compliance.

We adhere to objectives 16.5, 16.6 and 16.7 of the 2030 Agenda, which aim at fighting corruption and bribery.

Committed Leadership

The governance body is comprised of our business group's Board of Directors. The members of the Board remain in office for three years and can be reelected. Their appointment takes place at the General Shareholders' Meeting through the vote of the shareholders.

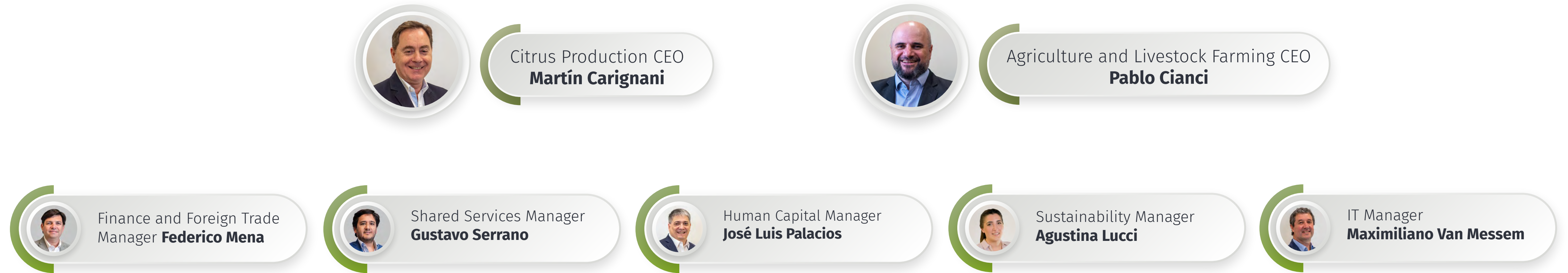


We also have various committees to promote joint work and attain the set goals:

- » **Executive Committee:** it is comprised of the Board of Directors and CEOs. It meets on a monthly basis and deals with topics based on the operations agenda of each company.
- » **Audit Committee:** it supervises the decision-making process regarding issues adopted by the Board of Directors that have an economic, environmental and social impact. One of its main duties consists in managing the regular business, always under the supervision of the Board of Directors. In addition, it coordinates the tasks of the company's Internal Audit Department.
- » **Ethics Committee:** it deals with the complaints made through the ethics hotline in order to guarantee confidentiality in each interaction through the professional work of the members of the Committee. It is in charge of assessing the case, dealing with it, arriving at a conclusion and providing a solution to the whistleblower.
- » **Crisis Committee:** it reviews and handles every serious and crucial situation that might jeopardise the development of the company's daily activities. It has a risk matrix and is trained to deal with critical situations related to financial, IT, environmental and social aspects.

Executive Structure

Grupo Lucci has 2 CEOs and 5 Managers that answer in a cross-sectional manner to the different business units. They work in a synergistic manner, leading each production area and providing support to Grupo Lucci's companies.



The decisions made by the senior executives must be authorised and supervised by the Board of Directors as well as all the decisions related to the management of the company's economic, social and environmental impact. The Executive and Audit Committees and the Internal Audit Department of the company are in charge of reviewing the processes.

Should there be any conflict of interest, it must be reported through the Ethics Hotline and it will be assessed by the Ethics Committee, which, in turn, informs the Board of Directors of the situation based on the seriousness of the case.

Ethics and Transparency

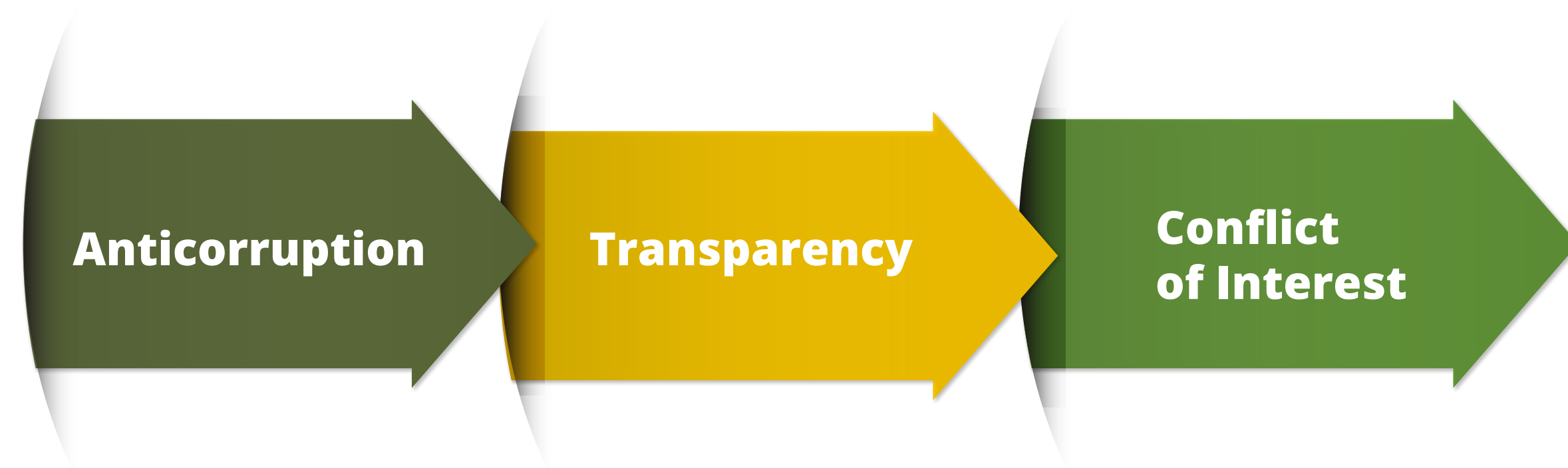
Code of Ethics

In 2022, we published the new version of our Code of Ethics, which is an essential institutional document that lays down the ethical principles governing our business group and guidelines in order to regulate the company's behaviour. This document is shared with all our collaborators and is available on the institutional webpage.



In addition, it addresses a series of cross-sectional guidelines within the value chain of each company, and it is part of **Grupo Lucci's Integrity Program**, in accordance with Argentine Law No. 27,401 on Criminal Liability of Legal Entities. In case of violation of the Code, the Ethics Committee intervenes analyzing the case and pronouncing on it.

The main points in the Code of Ethics are:



We worked on the mandatory training of all our collaborators. In this regard, we currently have, on our e-learning platform, the Integrity Program, which is mandatory for all the members of the company.

Ethics Hotline

In 2022, we changed the name of the Complaint and Suggestion process and replaced it with “Ethics Hotline.” Through such hotline, people can report anonymously any irregular situation or offence affecting our business group. Every report is dealt with responsibility by the Ethics Committee, monitoring the situation and looking for a solution.



Web channel
denuncias.grupolucci.com.ar



Phone number
+54 381 **4515 500** Ext.: 5563



Main office
Ruta 302 Km. 7 Cevil Pozo – Tucumán

You can find more information on our Ethics Hotline at:
<http://denuncias.grupolucci.com.ar/>

We Received 11 Complaints in 2022



All the complaints were dealt with, reviewing each case and providing a solution. There were no cases of corruption in the company during the reported year.

Challenges

In the following period, we aim at elaborating on topics related to integrity, corruption prevention and other offences in our training courses.

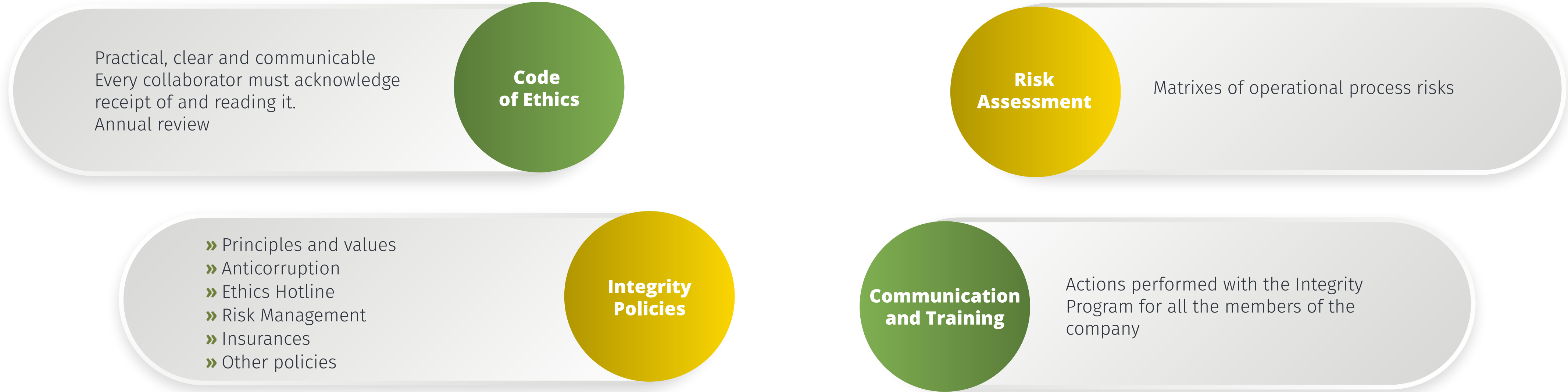
In addition, our goal for 2023 consists in analyzing risks in order to detect possible situations that deviate from the expected behaviour described in the Code of Ethics.

Integrity Program

At Grupo Lucci, we safeguard integrity in the development of the company. That is why, in 2021, we formalised our Integrity Program. Since then, we have incorporated the position of the Compliance Officer, who is in charge of ensuring compliance with the legal and ethical internal regulations and procedures as well as ensuring that the established procedures are followed by all the members of the company.



Integrity Program Structure



Once the Program was approved, the main objective was to train the company staff on topics related to corruption, focusing on its prevention.

 *We ran two training and introductory sessions on Audit and Internal Control for Grupo Lucci's new members. 34 people participated in them: 23 of them are administrative staff and 11 are technical staff.*

In addition, the Program aims at guaranteeing guidelines for a sustainable provision of goods and services, an appropriate cost management in the purchases and protecting the company and our stakeholders from business risks. The Purchasing Policy applies to collaborators and any strategic partner related to suppliers on behalf of our Company.

Internal Audits

Through our Annual Audit Plan, we aim at developing an internal control structure that reflects management transparency and transmits reliability to our stakeholders. In this way, we monitor compliance with the established procedures, regulations and policies, and suggest opportunities for improvement through the identification and management of relevant risks that affect our company's external and internal environment.

We work jointly with the different sectors, performing an in-depth analysis based on the detected risks. These results enable us to provide tools through consultancy, validating the coherence and viability of the suggested improvement plans, and promoting the implementation of good practices to contribute to long-term sustained growth.

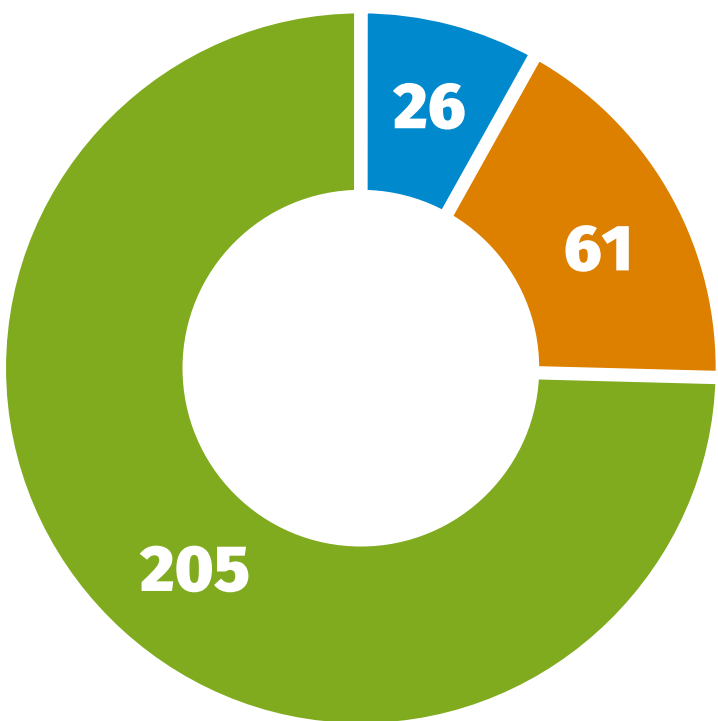


Annual Internal Audit Plan

- » **Process Audits:** they consist in the comprehensive analysis of an area or operation unit in order to assess the activities and controls, verifying they are suitable and efficient and that they comply with the established policies and procedures to achieve their goals.
- » **Asset Audits:** their goal consists in establishing and implementing methodologies and procedures for a better asset management in order to preserve the assets of Grupo Lucci's companies.
- » **Harvest Audits:** in order to monitor the compliance of the external suppliers with our good social practices, we visit the facilities to control the contractor and harvest staff in order to mitigate the risk of labour informality and prevent child labour.



In 2022, we complied with all the Annual Internal Audit Plan, conducting 292 audits.



2022 Audits

- Process Audits
- Asset Audits
- Lemon Harvest Audits

Audits Conducted in Each Company

