

Ethical Charter on Responsible Labor Practices

Limoneira Company, its board of directors and management (“Limoneira”), are committed to a policy of conducting business operations and acting in the best interest of our shareholders, employees (including temporary, seasonal and agency staff members), customers, supply chain and our community at the highest ethical degree. We believe everyone deserves to be treated with wellness, dignity and respect. We are committed to respecting workers’ rights and protecting their safety and health, while recognizing the cultural and legal differences found throughout the industry and the world.

Supplier Code of Conduct

This Ethical Charter on Responsible Labor Practices (“Charter”) serves as our Supplier Code of Conduct. Our expectation is that our business partners, contractors, consultants, vendors, and supply chain (including their supply chains and sub-contractors) will lawfully conduct their business with high standards of integrity and ethical behavior to protect the human rights of their employees as set forth in this Charter. 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; ensuring a safe and healthy work environment; permitting freedom of association and collective bargaining; providing at least the minimum wage and benefits required by law in locations where the supplier does business; ensuring working hours do not exceed the maximum set by applicable law; and operating in strict compliance with all applicable laws.

Mission Statement

Limoneira is an agricultural and community development company which, based upon its rich heritage and traditions, seeks to not only maximize value for its customers and shareholders, but to enhance its legacy by employing sustainable practices in all aspects of operations including stewardship of both its natural and human resources.

Our Guiding Principles

Legal Compliance

Obeying the law, both in letter and in spirit, is the foundation which governs our ethical standards. Limoneira and its suppliers must adhere to the laws and regulations as established by the applicable jurisdiction.

Occupational Safety & Health

Workers must be provided a safe, hygienic, and sanitary environment at both work-related sites, and at any housing mandated or provided by the employer. Employers must adopt reasonable measures to identify hazards and control occupational risk of injury and illness. Examples of such safeguards may include, but are not limited to, the following: industrial hygiene and sanitation programs; injury and illness prevention; emergency preparedness and response; chemical safety; equipment and machine safety; ergonomics; ventilation and lighting. Employer shall bear the burden of the costs of all personal protection equipment.

Wages & Benefits

Workers must be appropriately paid for all work performed. Employers must comply with all applicable legal requirements regarding legal eligibility to work, benefits and wages (including wages for overtime premiums and/or minimum compensation for any payment arrangement based on productivity). Employers must provide leave and benefits, as required by applicable law. Payments will be made in accordance with any applicable contract terms and pay calculations must be transparent to workers.

Working Hours

Employers must manage working hours in accordance with applicable laws, recognizing agricultural labor needs vary by season, crop and task, and workers are sometimes needed for shorter or longer time periods than a standard workweek. Employers must provide rest and meal periods to support a safe and healthy workplace. Employers must inform workers about their expectations regarding hours of work at time of hiring.

Communication and Worker Protections

Direct communication between management and their employees is the most effective way of resolving workplace issues and concerns. All workers must have both the right and responsibility to voice questions, report in good faith any improper, hazardous or wrongful activity, or discuss opportunities and/or grievances. To do so, there should be a fair, transparent, and accessible channel of communication to provide input to management and to resolve workplace issues. Employers should encourage timely disclosure of concerns and shall prohibit retaliation against anyone who, in good faith, reports concerns. Limoneira has an independent confidential whistleblower hotline, as described on our website at Limoneira.com. The reporting process is not intended to supersede normal managerial and human resources communication channels, but is provided as another resource to our staff.

Ethical Recruitment

Limoneira and its contractors will recruit workers ethically. Abusive, deceptive, fraudulent, or corrupt practices are unacceptable at any stage of the recruitment and selection process. Employers shall bear the costs of recruitment and placement. If third-party labor contractors are utilized, appropriate due diligence is performed to ensure their commitment to uphold our Charter. Limoneira is an equal opportunity and affirmative action employer. All qualified applicants will be considered regardless of race, creed, color, sex, sexual orientation, gender identity, religion, national origin, ancestry, age, protected veteran status, disability, marital status or other protected status. No worker in our supply chain shall pay to obtain or keep a job.

Management Systems and Continuous Improvement

Limoneira and its contractors commit to integrating sound management systems (such as policies, processes, education and training, documentation, communication, and feedback channels) that sustain and demonstrate compliance with applicable labor, employment, occupational health and safety laws governing the employer. They must look to these systems to continuously improve performance against compliance objectives.

Responsible Purchasing Practices

Companies purchasing commercial quantities of produce understand and seek to mitigate the impact of their planning and purchasing practices on the commitments in this Charter.

Human Trafficking and Slavery

Employment is freely chosen. Limoneira and its contractors must not tolerate modern day slavery – such as forced or compulsory labor, debt bondage, involuntary prison labor or the trafficking of persons. Limoneira and its contractors must commit to a work environment where employment is freely chosen and not performed under threat, coercion, force or menace of penalty.

Freedom of Association

Limoneira and its contractors will follow applicable laws regarding worker freedom of association and collective bargaining, including workers' equal right to engage in or refrain from any such activities.

Humane Treatment and Non-Harassment

Every worker deserves to be treated with dignity and respect and should not be subject to physical, sexual, psychological, or verbal harassment or abuse, coercion, or the threat of such conduct. Limoneira and its contractors shall maintain policies to address the need to prevent sexual harassment with education, communication and disciplinary procedures that demonstrate that such behavior will not be tolerated.

Non-Discrimination

Equal employment opportunities are respected, including respect for all individuals. Workers deserve a workplace free from unlawful discrimination in any form, where employment decisions are based only on the requirements of the job. This also includes bullying conduct by workers in the workplace.

Protection of Children and Young Workers

Respecting and supporting the well-being of requires employers to actively safeguard children's interests, preventing harm at the workplace. Young people who can legally and desire to work deserve economic opportunities but need age-appropriate work and appropriate supervision. Employers must commit to prevent children and/or young workers from performing work that is mentally, psychologically, physically or socially dangerous or harmful, or that hinders compulsory education. Employers must not hire anyone below the legal age of employment or younger than 15 where no minimum employment age exists within their jurisdiction.

Anti-Corruption

Limoneira is committed to conducting business fairly, honorably, with integrity, and in compliance with all applicable laws. The laws of most every country in the world make the payment, offer of payment or receipt of a bribe, kickback, or other corrupt payment a crime. Many laws specifically prohibit bribery of government officials, including the U.S. Foreign Corrupt Practices Act (the "FCPA"). Other countries have also enacted laws that prohibit bribery of government officials and non-governmental parties. These laws impose severe fines, penalties, and imprisonment for violations. Countries are increasingly imposing such punishment even where such payments are common within those countries. The purpose of Limoneira's FCPA Policy is to ensure compliance by all employees, officers, and directors of Limoneira, its subsidiaries and affiliates, suppliers and contractors with the FCPA and related anti-corruption laws of the U.S. and other countries in which Limoneira does or intends to do business. Our full policy can be found on our website at Limoneira.com.

As Applicable, Labor Contractor Laws, Housing, and Transportation Safety

Limoneira and its contractors will maintain compliance with all applicable Federal, State and local laws and regulations pertaining to the hiring of farm labor contractors, including the provision of housing and transportation of agricultural workers in the employ of Limoneira and its contractors.

Governance

Limoneira has a social responsibility committee (“SRC”) with representation from the Board of Directors, senior management, compliance, human resources and operations which governs this Charter. The SRC reviews our progress, at a minimum annually. This Charter was revised and approved by our SRC in July 2021.