

LIMONEIRA COMPANY (INCLUDING SUBSIDIARIES) POLICY ON HUMAN RIGHTS AND LABOR

Introduction and Purpose

Limoneira Company, its board of directors and management (“Limoneira”), are committed to respecting workers’ rights and protecting the safety and health of our employees (including temporary, part time, seasonal, and contract employees), customers, supply chain, consultants, and community. We recognize that cultural and legal differences are found throughout the industry and the world. We do this in accordance with the UN Guiding Principles on Business and Human Rights, as well as other leading independent standards such as the Responsible Business Alliance (RBA) and Worldwide Responsible Accredited Production (WRAP), and the Produce Marketing Association (PMA) Ethical Charter on Responsible Labor Practices.

We expect our business partners, contractors, consultants, and supply chain (including their supply chain) to protect human rights of their employees in accordance with this Policy on Human Rights and Labor (“Policy”) and our Ethical Charter on Responsible Labor Practices (“Charter”). Our Charter serve as our Supplier Code of Conduct (“Supplier Code”).

Limoneira’s 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.

Responsible Labor Practices

Limoneira conducts its business under the guiding principles of our Charter).

<https://investor.limoneira.com/static-files/917fc179-1df0-4c09-ae1e-9446448e7ac0>

Consistent with the guiding principles in our Charter, we:

- Prohibit forced labor and child labor.
- Prohibit discrimination based on race, religion, color, sex, age, disability, national origin, sexual orientation, marital status, citizenship status, veteran status and other legally protected characteristics.
- Work to establish safe, healthy and non-discriminatory working conditions.
- Forbid harassment, abuse and violence in the work environment.
- Value diversity and consider it core to our business strategy and mission statement.
- Seek to compensate employees competitively and operate in compliance with applicable wage, work hours, overtime, and benefit laws.
- Respect the principles of freedom of association and collective bargaining.
- Conduct business fairly, honorably, with integrity, and in compliance with all applicable laws.

Implementation, Interpretation, Education and Training

We regularly review the content and application of our policies with the goal of continuously improving our awareness and to fulfill our commitments. We believe training and awareness is a vital part of effective human rights practices and success of our mission statement. Everyone involved in the recruiting and hiring processes for the Company are annually trained on this Policy and our Charter.

The Director of Human Resources and the Director of Compliance and Business Development are authorized to interpret this Policy on behalf of the Company and to apply its terms to specific situations in which questions arise.

The Company encourages employees to improve their skills, fulfill their potential, achieve outstanding results and enjoyment of their work. We conduct department specific training programs, safety training, program management and have a tuition reimbursement program.

Stakeholder and Community Engagement

The Company recognizes we are a part of a broader community wherever we operate. In communities where we operate, we believe engaging stakeholders is fundamental to our respect of human rights. Where practical, we are committed to dialogue and engagement with relevant parties to understand, assess and address areas of concern as appropriate.

We invite any stakeholder concerned about potential human rights-related risks or impacts to reach out and share any concerns. The Company has an established anonymous whistleblower program (see below), or you may contact our Director of Human Resources. We are committed to regularly sharing updates with our shareholders, stakeholders and the public on our approach to addressing human rights-related risks and opportunities across our business and supply chain, through communications via our website.

Verification

Because of the number of suppliers, the Company has and their geographic dispersion, it is simply not practical to audit on an ongoing basis to confirm that all suppliers are in compliance with all aspects of our Supplier Code. Accordingly, we take a risk-based approach with respect to targeting audits and otherwise seeking to confirm compliance. For those suppliers that are in full compliance with our Code of Conduct, subsequent audits may be less frequent, as a way to reward suppliers and to encourage continued compliance long term.

We recognize there is always room for continuous improvement and some suppliers will need assistance to come into full compliance with our Supplier Code. For suppliers with audits that reveal the need for improvement, Limoneira requires Corrective Action Plans and re-audits to determine progress. Limoneira prefers to work with suppliers and/or their facilities to correct Supplier Code violations rather than apply sanctions that may cause further hardship to workers and their families who depend upon the employment.

Depending on the severity or lack of remediation of a Supplier Code violation(s), we do reserve the right to terminate our relationship and/or purchase order(s) with a supplier and/or their facility.

Governance and Reporting

The nominating and corporate governance committee of our Board of Directors has responsibility for oversight of the Company environmental, social responsibility and sustainability program. The Company has a Social Responsibility Committee (“SRC”) with representation from the Board of Directors, senior management, human resources, sustainability and compliance management and operations.

We conduct due diligence throughout our businesses to proactively identify, prevent and mitigate potential adverse human rights impact that may be a result of our actions or those of our supply chain. Many of these practices are integrated into our operations through existing documents including our employee handbook, anti-corruption policy, safety practices, food safety guidelines and specific department operating documents. We also rely on human rights impact assessments, social compliance audits, and legal and compliance reviews.

Limoneira has a Code of Ethics (“Code”) which is communicated to all employees and publicly available on our corporate website. The Board of Director’s audit and finance committee is responsible for applying the Code to any specific situation and has the authority to interpret the Code for any situation.

<https://investor.limoneira.com/static-files/67cb30f9-46d6-464d-9a08-d220a3e520f3>.

We strive to create workplaces in which open and honest communications among all staff are respected and valued. Any employee who believes a conflict arises between the language of this Policy, our Charter, the laws, customs and practices of the place where he or she works, or who has any questions about this Policy or our Charter or would like to confidentially report a potential violation of this Policy should be encouraged to do so. Limoneira does not retaliate or permit retaliation against any person for raising concerns under this Policy. Concerns can be reported to local management, the Company’s internal compliance or the Company’s human resources department. Employees and others can also confidentially report suspected policy violations through a third-party whistleblower program administrated by EthicsPoint. The Company will investigate, address and respond to the concerns and will take appropriate corrective action in response to any alleged violation. The whistle blower program information can be found on our website.

<https://secure.ethicspoint.com/domain/media/en/gui/30083/faq.pdf>

We reserve the right to amend this Policy at any time. This Policy was approved by the SRC in August 2021.