



ALICO SUSTAINABILITY POLICY

Alico believes sustainable practices support long-term ecological balance, environmental soundness, and social equity, and strives to extend its sustainability strategy to encompass all aspects of its business. While sustainability initiatives are focused primarily on the environment, social expectations are also extended into our supply chain.

SUSTAINABILITY FRAMEWORK

Alico's sustainability-related policies, programs and initiatives are organized into the following framework. Recognizing that all sustainability issues overlap and interconnect, the goal of this framework is to simplify and streamline the effective management and continuous improvement of environmental, social and governance performance.

ALICO ENVIRONMENTAL POLICY

Alico, Inc. is committed to reducing its impact on the environment and strives to improve its environmental performance over time by initiating meaningful projects and activities that will further reduce environmental impact, including the wise stewardship of natural resources.

Alico's commitment to the environment extends to customers, suppliers, employees, as well as the communities in which we operate. Alico is specifically committed to the following, as these areas are where Alico may have the most impact, or is most impacted:

- Compliance with all applicable environmental regulations
- Prevention of pollution whenever and wherever possible
- Clear communication of its environmental commitments and efforts to its customers, staff, and community
- Conservation of natural resources through careful planning and efficient use of water, energy, and materials
- Waste minimization through source reduction, reuse, recycling, and composting
- The handling and disposing of waste through safe and environmentally sustainable methods
- Using environmentally responsible practices when handling and disposing chemicals and hazardous materials, including wastewater and solid waste generated from operations. If hazardous or polluting materials are discharged improperly, appropriate authorities will be notified, and immediate action taken to correct and remediate
- The minimizing the generation of greenhouse gases, and the unintended release of substances that could cause harm to air, water, or land

Alico is particularly sensitive to water usage, and in connection with its commitment to reducing the harm caused by water over-usage, is committed to actively reducing its impact on the environment by managing water sustainably by reducing its water use, assessing water risks where it operates, implementing water stewardship in all operations, and working with stakeholders in shared watersheds towards the five water stewardship outcomes (good water governance, sustainable water balance, good water quality, healthy status of high conservation value areas and access to water for sanitation and hygiene).

ALICO LABOR RIGHTS POLICY

Scope

This Labor Rights Policy applies to all Alico, Inc. operations and to all locations and situations where Alico, Inc. business is conducted. The rules and principles outlined in this Policy apply to all Alico, Inc. personnel, including employees and contractors. Violations of this Policy may result in disciplinary action up to and including termination.

Purpose

Alico, Inc. is committed to the rights of our workforce to work in a safe, healthy, and productive workplace. This commitment is woven into the fabric of our core values and is further described in our Code of Conduct and other applicable policies and procedures.

Policy

1. Our Commitment to our Workforce

Alico, Inc. commits to providing healthy working conditions, open communication, professional growth, and development, fair work hours, and competitive wages and benefits. We actively support and defend the right to equality and freedom from discrimination, diversity and inclusion, freedom of association, workplace safety, and workplace security.

The Company encourages employees to practice open and honest communication without fear of reprisal or retaliation.

2. Health and Safety

Alico, Inc. provides a safe and healthy workplace and complies with applicable safety and health laws, regulations, and policies. We are dedicated to minimizing the risk of accidents, injury, and exposure to health risks. While accidents and injuries are rare, we are nevertheless committed to engaging with our employees to continually improve the health and safety in our workplace, including the identification of hazards and remediation of health and safety issues.

We ensure our workplaces are free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal or external threats.

For additional policies addressing workplace safety and security, consult the Alico, Inc. Employee Handbook.

3. Freedom of Association

Alico, Inc. respects the rights of employees to join organizations or bargaining groups for representation and to engage in collective bargaining, as permitted by applicable laws in the countries where Alico, Inc. does business.

4. Labor Standards

Alico, Inc. maintains labor standards including hours, conditions, wages, and overtime pay practices that comply with the laws of the jurisdictions in which we operate. Alico, Inc. provides compensation packages that are competitive for the locations in which our employees work.

5. Non-Discrimination

Alico, Inc. is committed to providing equal employment opportunities and complies with all applicable laws that prohibit employment discrimination on the basis of age, sex, gender (including pregnancy), race, color, disability, genetic information, national origin, sexual orientation, gender identity, religion, military or veteran status, or any other legally protected characteristic. All employment decisions are covered by this commitment, including recruiting, hiring, training, promotions, pay practices, benefits, disciplinary actions, and terminations. For additional information about Alico, Inc. Anti-Discrimination and Anti-Harassment policies, consult the Alico, Inc. employee handbook.

6. Professional Growth and Development

Alico, Inc. is committed to fostering continuous professional growth, learning and development among our employees. We offer a variety of online and classroom training opportunities to employees across the organization. For additional information about professional growth and development opportunities, please contact Alico, Inc. Human Resources.

7. Employee Privacy

Alico, Inc. respects our employees' privacy and complies with all applicable laws regulating the disclosure of personal information, including data protection laws. We are transparent in our use of data, and protect the rights of our employees, contractors, customers, and business partners.

8. Respect for Human Rights

Respect for human rights is a fundamental value of Alico, Inc. As described in more detail in our Human Rights Policy, Alico, Inc. opposes all forms of discrimination, slavery, child labor, servitude, forced labor, and human trafficking. Alico, Inc. prohibits modern slavery in its operations, in its supply chain, and by its business partners around the globe.

Alico, Inc. strictly prohibits all Alico, Inc. employees from engaging in any form of human trafficking. Failure to respect anti-trafficking may result in disciplinary action up to and including termination.

Alico, Inc. also complies with all applicable laws regarding the employment of minors. Alico, Inc. does not tolerate any form of exploitative child labor.

Conclusion and Reporting Concerns

Alico, Inc. employees should immediately report any conduct, including human rights concerns, that could potentially constitute a violation of the law or this Policy by following the steps listed in the Alico, Inc. Code of Conduct.

Employees may report suspected policy violations via the following methods:

Whistleblower Hotline: 877-778-5463

Whistleblower Mailing Address:

Audit Committee

10070 Daniels Interstate Court, Ste. 100

Fort Myers, Florida 33913

Online: <http://www.reportit.net>

No retaliatory action will be taken against any Alico, Inc. employee for raising concerns or claims made in good faith under this Policy.

Alico, Inc. is committed to investigating, addressing, and responding to the issues and concerns of its employees and to taking appropriate corrective action in response to any violation.

ALICO HUMAN RIGHTS POLICY

Respect for Human Rights

Respect for human rights is a fundamental value of Alico, Inc. We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights in our relationships with our employees, suppliers, and vendors. Our aim is to help increase the enjoyment of human rights within the communities in which we operate.

This Policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

This policy applies to Alico, Inc., and the facilities that we manage. The Company also expects our vendors and suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

We use due diligence to identify and prevent human rights risks to people in our business and value chain. Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for, or cooperate in, their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties.

More specifically, Alico believes human rights are *universal, inalienable, interconnected, indivisible, and non-discriminatory*:

- Universal – Human rights *belong to all people*
- Inalienable – Human rights *cannot be taken away*
- Interconnected – Human rights *are dependent on one another*
- Indivisible – Human rights *cannot be treated in isolation*
- Non-discriminatory – Human rights *should be respected without prejudice*

The Human Rights Policy is overseen by Alico, Inc.'s Board of Directors through its Sustainability and Corporate Responsibility Committee. The responsibility of that Committee is to assist the Board in fulfilling the Board's responsibility for the oversight of relevant sustainability and corporate social responsibility policies, strategies, and programs of the Company.

Community and Stakeholder Engagement

We recognize that we are part of the communities in which we operate. We engage with communities on human rights matters that are important to them such as land rights, access to water and health. We also engage with people in those communities, including vulnerable and disadvantaged groups. Our aim is to ensure through dialogue that we are listening to, learning from, and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level.

Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues in our Company, across our value chain and with our various sponsorships, through which we seek to promote respect for human rights.

Diversity and Inclusion

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Company is qualifications, performance, skills, and experience.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

We are committed to meaningful engagement with all potential and currently impacted rights-holders, particularly those who are traditionally excluded or marginalized, including women, children, migrant workers, and indigenous peoples. We are committed to ensuring the availability of accessible grievance/whistleblower mechanisms for our own employees, contractors, and subcontractors, as well as anyone else to use for raising any concerns, and to better enable Alico, Inc. to appropriately redress human rights impacts which we have either caused or contributed to. We are also committed to ensuring we don't unreasonably inhibit access to other forms of remedy for potentially and currently impacted rights-holders.

Freedom of Association and Collective Bargaining

We respect our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy, and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury, and health impacts.

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Child Labor

We prohibit the hiring of individuals who are under 18 years of age for positions in which hazardous work is required.

Work Hours, Wages and Benefits

We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime, and benefits laws.

Land Rights and Water Resources

We recognize the significant implications regarding respect for human rights that land use and water use across our value chain may have, which we address through specific policy and action.

We declare water as a human right and respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation. Additionally, OSHA's Field Sanitation Standard (§ 1928.110) requires employers in agricultural operations to provide sufficient toilet facilities, handwashing facilities, and potable drinking water to their employees. At Alico, employees are provided with bottled water, 5 jug gallon water stations, and ice for their coolers.

Have a Question or Concern?

- Please raise any questions or concerns with your manager or Human Resources
- Anyone may also report suspected policy violations via the following methods:

Whistleblower Hotline: 877-778-5463

Whistleblower Mailing Address:
Audit Committee
10070 Daniels Interstate Court, Ste. 100
Fort Myers, Florida 33913

Online: <http://www.reportit.net>

The Company reserves the right to amend this policy at any time. Nothing in this policy says or implies that a contract exists between the Company and its employees or any third party or that compliance with this policy is a guarantee of continued employment with Alico, Inc.

ACCOUNTABILITY FOR SUSTAINABILITY PERFORMANCE

Alico's Sustainability Council comprises representatives from each of the Company's primary business units, responsible for recommending and implementing sustainability policies, objectives and goals; managing the process for responding to customer questions related to sustainability; developing and tracking metrics consistent with Alico's sustainability goals; and maintaining appropriate sustainability content on the company website and social media.

The Sustainability Council meets monthly and reports to the Sustainability and Corporate Responsibility Committee of the Alico, Inc. Board of Directors. The responsibility of that Committee is to assist the Board in fulfilling the Board's responsibility for the oversight of relevant sustainability and corporate social responsibility policies, strategies, and programs of the Company.