



ALICO, INC. VENDOR CODE OF CONDUCT

Introduction

Alico, Inc., intends to conduct its business honestly and ethically wherever it operates in the world. Alico will continually improve the quality of its services, products and operations and will maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment.

These core values also represent Alico's expectation for how vendors, its vital business partners, conduct their business.

Alico expects all its vendors to comply with this Vendor Code of Conduct.

1. Compliance with Laws, Rules and Regulations

Obedying the law, both in letter and in spirit, is the foundation on which Alico's ethical standards are built. All directors, officers, employees, and vendors must respect and obey the laws of the United States and of the cities and states in which we operate.

2. 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 for the purpose of attracting or influencing business activity. The United States Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates for the purpose of obtaining or retaining business. Therefore, this Code strictly prohibits making illegal payments to government officials of any country. These prohibitions apply to conduct anywhere in the world and extend to Alico's officers, directors, employees, vendors, and agents (which can include consultants, distributors, joint venture partners and others). Some anti-corruption laws create a separate offense for failing to keep accurate records of business transactions, so all relevant records—including invoices—should accurately reflect the associated business transactions. If anyone is aware of any violations or possible violations of the Foreign Corrupt Practices Act, please report to either Alico's Director of Human Resources, and/or Alico's Sustainability and Corporate Responsibility Committee of the Board of Directors.

Alico'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 vendor, to any Alico director, officer or employee (or any family member of any such person) in connection with Alico's 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.

3. Human Trafficking and Slavery

Alico's expectation is that its vendors (as well as their vendors and subcontractors) will lawfully conduct their business with high standards of integrity and ethical behavior to protect the human rights of their employees, and to treat them with dignity and respect. This includes:

- 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, 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
- providing at least the minimum wage and benefits required by law in locations where the vendor does business
- 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 vendor does business

Alico's Vendor Code of Conduct is made available to its vendors and management. Alico expects all vendors to share the principles expressed here, and in its complete Vendor Code of Conduct, because the understanding of and adherence to the Vendor Code of Conduct is an important component of the vendor evaluation and selection process. Alico management and vendors have the responsibility to report exceptions to this policy as defined in this Code of Conduct.

Alico 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 its supply chain, Alico may act upon discovery, including immediate remediation and possible termination of the business relationship.

4. Occupational Safety

Alico expects its vendors 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, investigation of work-related injuries, and the organization should strive for continual improvement.

5. Environmental Impact

Alico expects its vendors to minimize their operation's impact on the environment. Vendors 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, and raw materials
- 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 shall be taken to correct and remediate

The prevention of pollution, including greenhouse gases, and unintended release of substances that may cause harm to air, water, or land

6. Supply Chain Audits

Alico is committed to conducting Supply Chain Audits and may hire a third party to do so. This audit may consist of auditing for compliance with this Code of Conduct, including, but not limited to, product safety, environmental impact, and environmental management. Alico expects its vendors to cooperate with the personnel assigned to conduct the audit.

7. Compliance Procedures; Reporting Misconduct or Other Ethical Violations

Vendors are required to promptly report any unethical, dishonest, or illegal behavior, or any other violation of this Code or of other Alico policies and procedures to the Director of Human Resources. The telephone number is (863) 877-3440; the mailing address is 10070 Daniels Interstate Court, Suite 100, Fort Myers, Florida, 33913; the email address is hrdepartment@alicoinc.com.

You may report any concerns regarding the Company's internal accounting controls or auditing matters by calling 877-778-5463 (option of English or Spanish). This number allows for a confidential message to be left for our audit committee. A confidential message may also be left online for our audit committee at <http://www.reportit.net>.

Alico's policy is not to allow retaliation for a report of unethical, dishonest or illegal behavior, or of any other violation of this Code or of other Alico policies and procedures. If a vendor is found to be in non-compliance with this Vendor Code of Conduct, Alico can take action upon discovery, including immediate remediation and possible termination of the business relationship.