



Victor Icaza and Dalember Carbo
SanLucar Pickers

SanLucar

Taste the SUN 

Our Code of Ethics

17.02.2026





The SanLucar¹ Code of Ethics is based on Human Rights, the Principles of the United Nations Global Compact, the international conventions of the ILO, as well as the requirements of the Ethical Trading Initiative (ETI) Base Code and the GRASP assessment.

This code contains 10 ethical principles, which we fulfill at SanLucar. They also describe a common compromise with our partners, employees, growers and clients.

These principles are based on a three dimensions quality concept - a tasteful, safe and healthy product, environmental protection and a respectful treatment of all persons. The daily application of these principles enables the consumer to enjoy the best fruits and vegetables.





1. Voluntary work

We do not resort to any form of forced labour, slavery, humiliation or involuntary work. We determine the working conditions in compliance with all the laws applicable in the country.

- Conventions 29 (forced labour) and 105 (abolition of forced labour) and recommendation 35 (Indirect Compulsion) of the ILO.
- Principles 1, 2 and 4 of the Global Compact of The United Nations.
- Universal Declaration of Human Rights.



Ricardo Quiros
SanLucar Picker



2. Child protection

We do not accept contracting children under the age of 15 or the age at which compulsory education ends in every country. Young employees may only be employed in circumstances in which they are fully protected from exploitation, physical and moral hazards long term damages of their health as well as from any interruption of their education. Likewise, we motivate young employees to go to school and to participate in professional internships or other educational programs.

- Convention 138 and recommendation 146 (minimum age) of the ILO.
- Convention 182 of the ILO (worst forms of child labour).
- Principles 1, 2 and 5 of the Global Compact.
- Convention of the United Nations on the Rights of the Child.



3. Right of association and collective negotiation

We respect the right of association and collective negotiation. Employees will also have the right to join associations included in the law, without discrimination. We have an open attitude towards the trade union activities and those of the associations. The employees' representatives will not be discriminated by us and must have the freedom to carry out their representative functions. To permit and comply with their tasks they must have access to all the workplaces.

- Convention 87 of the ILO (liberty to choose labour union and protection of the freedom of association).
- Convention 98 of the ILO (right of association and collective negotiation).
- Convention 135 of the ILO (representative of the employees).
- Principle 3 of the Global Compact.





4. Equality

We guarantee that all employees are treated in the same way, and offer everyone the same opportunities. People with the same skills must be treated in the same way and discrimination in hiring or promotion will not exist. Discrimination based on race, social or national origin, caste, birth, religion, disability, gender, sexual orientation, relative responsibility, marital status, affiliation to trade unions, political opinions, age or any other condition, which could lead to discrimination, is not practiced nor supported by us.

- Conventions 100 (equality of remuneration) and 190 (Violence and Harassment) and recommendations 90 (Equal Remuneration) and 111 (discrimination during the employment and the occupation) of the ILO.
- Principle 6 of the Global Compact of the United Nations.
- Convention of the United Nations on the elimination of all forms of discrimination against women.
- Convention of the United Nations on the elimination of all forms of racial discrimination.
- Universal Declaration of Human Rights.

Juan, Ricardo, Juan
y Maribel Poveda
SanLucar Master Growers





5. Responsible employment contracts

We specify the work relationship in a written employment contract. The employee will at least receive a copy of such.

We are aligned with the Employer Pays Principle: No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer.

We do not demand our employees to hand over their ID documents. They are free to leave the employment whenever they want, after notifying this within a reasonable time.

- Convention 102 (social security – minimum norm) and 122 (Employment Policy Convention) of the ILO.



Irmgard Hensen
SanLucar Master Grower



6. Legal and coherent working hours

We adhere to the working hours, salaries, overtime payments and right to holidays, which are determined in the legislation of the country. We do not oblige the employees to work regularly more than 48 hours per week. They will have the right to rest at least one day per week. It is a fact that overtime working is required in certain periods or times of the year, although this must not be in any case

excessive and the overtime must be carried out voluntarily and must not exceed 12 hours per week.

- Convention 1 of the ILO on the working hours (industry) and recommendation 116 (reduction of the working time).

Elena Vega
SanLucar Picker





7. Legal and coherent salary

We respect the minimum legal standards for the salary of a regular working time. We inform our employees in detail and understandably about the exact structure of their salary (itemization). We pay the salaries in time and keep a registry of the payments made to the employees. We do not allow

salary deductions that are not foreseen in the national laws.

- Convention 131 of the ILO (fixing of the minimum salary).

Guadalupe Navarro
and Carmen Lora
SanLucar Pickers





8. Work health and safety and suitable working conditions

We provide a safe and hygienic workplace, in such a way that the workplace does not damage the employees' health and safety.

We abide the internationally recognized health and safety standards. Hygienic toilets must be available at the workplace with no restrictions of use.

If applicable, the staff bedrooms or sleeping facilities must be kept clean and in good conditions, that is, to have appropriate lighting, to be well ventilated, to provide access to drinkable water and hygienic bathrooms.

- Convention 155 of the ILO and recommendation 164 (security and health of the employees).
- Convention 159 of the ILO (professional rehabilitation and employment of disabled persons).
- Convention 183 of the ILO (protection of the maternity).
- Convention 81 of the ILO (labour inspection).



Linda Flores
SanLucar Picker



9. Commitment to environmental protection

In SanLucar we acquired a clear commitment and we strive to avoid or reduce the production of waste, the contamination of the environment and the irresponsible use of natural resources.

- Principles 7, 8 and 9 of the Global Compact of the United Nations.





10. Good governance and fight against corruption

From the management body of SanLucar, we reject any form of bribery, extortion and any kind of corruption, as defined in the applicable international agreements.

- Principle 10 of the Global Compact of the United Nations.

