

DMPL CODE OF BUSINESS ETHICS

GUIDING PRINCIPLE

Del Monte Pacific Limited and all subsidiary companies (collectively referred to as the "Company") shall conduct their businesses in a manner which, in all reasonable circumstances, is above reproach. In line with this, the Company expects from all officers and employees the highest standards of business and personal ethics. Company employees must act with the utmost fairness and according to the highest moral principles when dealing with the Company's stakeholders — co-employees, customers, suppliers, shareholders, the government and surrounding communities.

CODE OF CONDUCT

I. THE COMPANY AND ITS EMPLOYEES

- The Company shall value its employees and recognize their important role in the successful conduct of its business.
- The Company shall consider its employees as partners and shall deal with them on the basis of mutual trust and respect.
- The Company shall cultivate among its employees a culture of integrity and excellence and a sense of accountability, transparency and urgency.
- The Company shall be committed to provide its employees a safe and healthy working environment.
- The Company expects of its employees conduct that is beyond reproach.
- Employees shall comply with all Company rules and regulations and report violations or suspected violations of said rules and regulations.
- Employees shall not engage in any activity or harbor any personal interests that could conflict or even appear to conflict with those of the Company.

• Employees shall protect Company proprietary information from unauthorized disclosure to third parties.

II. THE COMPANY AND ITS CUSTOMERS

- The Company shall continually provide high quality products and best in class service to
 its customers. It shall endeavor to be the world's best source of processed pineapple,
 tropical fruit and other products in terms of quality, supply reliability, customer service
 and price competitiveness.
- Consumer satisfaction, health and safety shall always be of paramount concern to the Company.
- In order to ensure consumer satisfaction, the Company shall strive to establish effective communication lines with its customers and always be sensitive to consumers' concerns and needs.
- The Company's advertising shall be truthful. Information on the Company's products and services must be accurately communicated.

III. THE COMPANY AND ITS SUPPLIERS

- The Company acknowledges the importance of building a sound relationship with its suppliers. Accordingly, the Company shall conduct business with all customers on the basis of integrity, mutual interest and fairness.
- The Company abhors any form of corruption by its employees and suppliers. Any solicitation or offering of gifts, payments or commissions by Company employees and their families, or by suppliers and their representatives, in exchange for business or for personal gain is strictly prohibited. Employees are expected to report any such violations or suspected violations.

IV. THE COMPANY AND ITS SHAREHOLDERS

• Company officers and employees should treasure the trust and confidence given them by the Company's shareholders.

- In keeping with this trust, Company officers and employees shall continuously deliver best quality products with the highest level of service.
- Company officers and employees shall safeguard company assets and facilities at all times.
- The Company's management shall ensure that the company's financial books and records accurately and honestly reflect transactions and events and conform to the Company's system of internal controls as well as generally accepted accounting principles.
- The Company's management shall ensure that there is transparency in information provided to shareholders.

V. THE COMPANY, THE GOVERNMENT AND ITS LAWS

- The Company shall endeavor to comply with all laws, rules and regulations that govern its business. It shall be guided by the principles of ethical conduct when dealing with the government, its agencies and instrumentalities.
- The Company shall respect the laws of all countries where it conducts business.
- The Company shall promote honesty and integrity in dealing with government agencies and instrumentalities. Company employees are prohibited from influencing the government's judgment or conduct through the giving of bribes or other unlawful inducements.
- The Company shall not engage in partisan politics and shall prohibit its employees from using the Company's name and/or resources in campaigning for or against particular candidates during elections.

VI. THE COMPANY AND THE COMMUNITY

- The Company shall strive to be a good corporate citizen.
- The Company shall contribute positively to the environment and the communities in which it operates. It shall also promote social responsibility by supporting the health, education and welfare of these communities.

- The Company may undertake various outreach programs to improve the welfare of the local communities in which it operates. These programs may include scholarships, health care, family planning, sports development and other acts of charity.
- The Company shall protect the environment. The Company shall strive to conserve natural resources, promote sound environmental values and practices, and manage waste effectively, as well as comply with the laws and regulations of the jurisdictions in which it operates.
- The Company shall respect human rights. It shall promote equal opportunity for employment and career advancement regardless of age, race, gender, ethnicity and religion. It opposes child labor and other forms of exploitation of workers.
- In dealing with the news media and the public in general, the Company shall project a positive image based on truth.