



AGROFERT GROUP CODE OF CONDUCT

1. INTRODUCTORY PROVISIONS

- 1.1. At AGROFERT, we are fully aware of our responsibility towards our employees, business partners and society as a whole. This Code of Conduct (hereinafter the “Code of Conduct”) sets out the minimum principles of ethical behaviour and sustainable business conduct that form the basis of our corporate culture and must be observed by all AGROFERT Group companies and all members of the AGROFERT Group companies’ corporate bodies and employees, temporary employees, including employees of employment agencies, and persons representing AGROFERT Group companies (hereinafter “employee(s)”).
- 1.2. Violations of the principles of this Code of Conduct can have serious consequences for both the individual (disciplinary proceedings, possible termination of the employment relationship, financial consequences, for example in the form of damage compensations or administrative sanctions and, in serious cases, criminal liability) and for AGROFERT Group companies (damage to reputation, fines and damage compensations, exclusion from the tender procedure, possible criminal liability of the legal entity, etc.). Each employee shall be acquainted with and trained in the Code of Conduct upon the commencement of their employment or similar relationship and at regular intervals during the employment relationship. It is the responsibility and duty of each employee to comply with the Code of Conduct and to seek advice where necessary on any unclear issues.
- 1.3. The Code of Conduct is based on the governance systems, control mechanisms and other internal regulations of the AGROFERT Group companies, which take into account the specifics of the location and business sector of the respective companies.
- 1.4. We also expect our business partners to apply the principles of ethical behaviour and sustainable business to the extent appropriate. To this end, a Code of Conduct for Business Partners has been issued.

2. BASIC PRINCIPLES OF ETHICAL BEHAVIOUR AND SUSTAINABLE BUSINESS IN THE AGROFERT GROUP

2.1. Conduct in accordance with legal and internal regulations, ethical rules and sustainability principles

- 2.1.1. Compliance with laws, regulations and rules is one of our guiding principles. In all areas of our business activities, all AGROFERT Group companies and all employees are obliged to comply with the applicable laws of the country or countries in which AGROFERT Group companies or their employees operate, the regulations of the AGROFERT Group and the respective companies, and the relevant sustainability standards, which include responsible behaviour towards employees, business partners, communities, society and the environment.

- 2.1.2. We respect human rights. We conduct our business in accordance with international and European instruments and treaties in the field of sustainability and human rights, in particular the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the ILO Core Conventions.
- 2.1.3. We have internal policies and procedures in place to prevent any human rights violations and, should they occur, to take prompt and effective remedial and preventative action in the future.

2.2. Basic principles of ethical behaviour

- 2.2.1. We are aware of our duties and responsibilities both internally and towards external partners.
- 2.2.2. We ensure equal and non-discriminatory conditions for employees and other persons regardless of their age, race, ethnic origin, colour, national or social origin, religion, gender, marital status, sexual orientation, gender identity, political beliefs, disability or handicap. Any other forms of discrimination covered by EU and national law, including sexual and other forms of harassment as a specific form of discrimination, are also not allowed.
- 2.2.3. We do not tolerate violence, threats, insults, intimidation, any kind of assault and aggressive behaviour, behaviour that creates a hostile atmosphere or other inappropriate behaviour at the workplace.
- 2.2.4. We respect the differences and diversity of each individual; the sole criteria for recruitment, evaluation, placement, training and promotion of employees at all levels are qualifications, skills and experience or other objective criteria related to the work performed by the employee.
- 2.2.5. We take the same approach to core staff and temporary staff, including agency employees.
- 2.2.6. We promote teamwork and willingness to share information and knowledge.
- 2.2.7. We adhere to the minimum age for employment in our locations and reject the use of child labour, forced or compulsory labour and all forms of modern slavery and human trafficking, both in our own operations and those of our business partners.
- 2.2.8. We respect the human dignity, privacy and personal rights of each individual and take into account the interests, opinions and rights of the individual to an objective extent when making decisions.
- 2.2.9. We show esteem and respect to colleagues and superiors, and our approach creates conditions for mutual cooperation, respecting the instructions of superiors and not taking actions that diminish the authority of our colleagues or superiors.
- 2.2.10. We provide reliable information and do not tolerate the submission of false or misrepresented information, information taken out of context, concealment of material facts or other dishonesty or manipulation.
- 2.2.11. We promote innovation, new proposals and solutions, beneficial changes, the ability to accept new solutions in practice, and the willingness to help a fellow employee in an appropriate way.

- 2.2.12. We recognize the rights of workers to freedom of expression, freedom of association, and respect the right of employees to join, form or not join a trade union without fear of reprisal, intimidation or harassment. Where employees are represented by legally recognised trade unions, we are committed to engaging in constructive social dialogue and good faith bargaining with their freely elected representatives.
- 2.2.13. We provide fair and equitable wages, including equal pay for men and women workers for equal work or work of equal value, benefits and other terms and conditions of employment in accordance with applicable laws in our place of business and international standards and conventions.
- 2.2.14. We respect the working hours and the right to rest of every employee in accordance with the applicable legislation.
- 2.2.15. We protect our employees and third parties. We comply with applicable laws and regulations, as well as with the relevant company rules on occupational health and safety and rules for the safe operation of technical equipment. We provide appropriate protective equipment, training, improve working conditions and take other measures to monitor and reduce risks.

2.3. Management, responsibility and control of senior staff

- 2.3.1. The culture of ethical behaviour and compliance with the set rules starts with the top management of AGROFERT Group companies. All corporate body members, managers and executives set an example of ethical behaviour for other employees, have a thorough knowledge of the rules and ensure their implementation and compliance in practice, communicate this Code of Conduct and ensure training to be provided to employees, proactively identify issues and risks of possible violations of the Code of Conduct and take appropriate preventive measures to minimise them. They create an environment where employees are not afraid to raise concerns about violations. They take appropriate action unconditionally and immediately when violations are detected.
- 2.3.2. Senior employees are responsible for their subordinates in terms of organisational and employment regulations and ensure their training.

They are obliged to:

- with regard to the principles of the Code of Conduct, organise and control the performance of the tasks assigned, ensuring compliances with legal and internal regulations and preventing any violation thereof;
- have tasks of a technical and operational nature professionally examined in terms of the technical basis relevant to the matter in question, safety, fire, health and environmental aspects, including the submission of relevant documentation, certificates and attestations, trial and test results;
- not to tolerate violations of legal regulations and internal rules and to take employment law consequences in case of their attempted violations. They are aware that violation of ethical rules, human rights, sustainability principles, work safety rules, fire protection, neglect of preventive measures and maintenance can lead not only to ethical consequences for the company and the affected employees, but also to material and financial damage that far exceeds the cost of preventive action, or even to charges in terms of administrative or criminal liability of the company;

- resolve any ambiguities in resolving employment issues with the HR and legal department to ensure that the resolution of the issue is consistent with employment law, administrative and criminal liability of the legal entity and other legal regulations.

2.3.3. The responsibility of senior employees does not relieve other employees of their own responsibility in fulfilling the principles set out in this Code of Conduct and in carrying out their job responsibilities.

2.4. Responsibility for public image of AGROFERT Group

2.4.1. We advocate integrity in our conduct and are committed to create a good public image of the AGROFERT Group and its individual companies. Employees shall refrain from activities that could compromise the integrity or damage the reputation of AGROFERT Group companies.

2.4.2. Every employee and other persons working in a legal relationship with AGROFERT Group companies must respect that persons – in particular spokespersons of companies or other authorised employees or departments of individual companies – are designated for crisis communication or for statements addressed to the media or posted on social networks, so that the information provided is not distorted and the legitimate interests of the company or AGROFERT Group are not undermined.

2.4.3. Employees should refrain from all speech (even private) that is detrimental to the legitimate interests of the company or AGROFERT Group. Employees must be careful in the use of social networks and means of communication as well as in their private activities and avoid the disclosure of confidential information as well as information that could be perceived as offensive, damaging, humiliating or defamatory towards individuals or the company. They must also comply with data protection regulations when posting contributions.

2.4.4. If there may be any doubt as to whether an employee is presenting an opinion on behalf of the company or AGROFERT Group in their posts on internet forums and networks, they shall clearly indicate that they are presenting their personal opinion.

2.5. Responsibility towards communities

2.5.1. We are aware of our responsibility towards the communities and regions in which we operate.

2.5.2. We monitor the impact of our activities and take appropriate account of the views and interests of the community.

2.5.3. We strive to avoid or mitigate negative impacts arising from or in connection with our activities, regardless of whether we caused them or contributed to them.

2.5.4. We are a good and responsible neighbour and encourage cooperation with local partners as well as the employment of local residents (including access to any necessary training and education).

2.5.5. We respect the rights of vulnerable groups, local communities and indigenous peoples in places where they are affected by our business.

- 2.5.6. We support development, innovation and technological advancement and develop scientific, technical and other cooperation with local schools, universities and public research and development institutions as needed.
- 2.5.7. Our activities aim to contribute to economic, social and environmental progress towards sustainable development.
- 2.5.8. We exert reasonable efforts to ensure that we do not use raw materials in our products that originate from conflict-affected and high-risk areas, and thus cannot contribute directly or indirectly to human rights abuses, corruption, the financing or favouring of armed groups or similar negative consequences.

2.6. Interests of consumers and end users, quality and health safety of products

- 2.6.1. We are fully aware of our commitments to consumers and end users of our products and services.
- 2.6.2. We have quality management and control systems implemented to ensure that our products and production processes meet or exceed legislative and regulatory requirements, as the quality and safety of our products and production processes are among the highest priorities in all sectors where we do business (safe and healthy food and feed, agricultural commodities, sustainable biofuels, safe chemical products that meet environmental standards, etc.).
- 2.6.3. We take all steps required by law to ensure the quality and reliability of the goods and services we provide.
- 2.6.4. We make sure that our goods and services meet all agreed and legal requirements in the area of customer health and safety, including health warnings and product and safety labels.
- 2.6.5. We use honest and responsible business, marketing and advertising practices and procedures in connection with the sale of products or the provision of services and reject any deception, misrepresentation, fraudulent, unfair or dishonest practices with respect to consumers and end users.
- 2.6.6. We provide equal treatment to all our customers regardless of their gender, age, appearance, status, nationality, religion or sexual orientation or other characteristics.
- 2.6.7. We provide full, accurate and clear information on the content, composition, health safety, safe use, maintenance, storage and waste management with respect to our goods and services to the extent appropriate to enable the customer to make informed decisions.
- 2.6.8. We respect the privacy of our customers and ensure the protection of their personal data.
- 2.6.9. We provide transparent and efficient procedures for resolving customer complaints, contributing to the fair and timely resolution of consumer disputes without unnecessary costs or other burdens.
- 2.6.10. We cooperate fully and transparently with government authorities to prevent or eliminate serious threats to public health and safety arising from the consumption or use of our products.

2.7. Environment

- 2.7.1. We respect environmental protection. We comply with applicable legislation and international conventions relating to environmental protection and the prevention of environmental accidents.
- 2.7.2. We hold and maintain all necessary official permits, licences and registrations in this area and comply with the conditions and requirements set out therein.
- 2.7.3. We monitor the environmental risks associated with our products and services and their impacts, incorporate into our internal policies and procedures requirements to prevent and minimise environmental risks and reduce negative environmental impacts, and transparently communicate the environmental impacts of our products and services.
- 2.7.4. We place emphasis on the protection of nature, biodiversity, soil and water resources.
- 2.7.5. We ensure the welfare and well-being of animals and do not tolerate abusive, negligent or inhumane treatment of animals in our operations and supply chains, taking into account not only current legislation in this area, but also the increased demands of certifications and customers and recommended breeding practices.
- 2.7.6. We use natural resources responsibly and efficiently, striving to minimise the consumption of energy, water and raw materials and to use environmentally friendly technologies and renewable or sustainable resources as much as possible.
- 2.7.7. We strive to minimise emissions to soil, water and air that can cause pollution or contribute to climate change.
- 2.7.8. We support responsible and sustainable sourcing of raw materials.
- 2.7.9. We take measures to minimize the generation and management of waste and its disposal in accordance with applicable legal regulations and in an environmentally sound manner.
- 2.7.10. We strive to continuously improve environmental protection and promote sustainable development according to current sustainability standards.

2.8. Taxes

- 2.8.1. We are aware of our social responsibility in the area of tax compliance. We assess tax risks, comply with the applicable tax regulations in the countries where we operate and pay taxes in accordance with the interpretation of applicable legislation, provide transparent information and cooperate with the relevant authorities.
- 2.8.2. We comply with the rules of arm's length principle when determining transfer prices. We do not intentionally use any mechanisms, schemes or business structures that would unlawfully reduce our tax burden or lead to tax avoidance. Similarly, we reject any unusual requests from our business partners raising concerns that they may represent illegal attempts to avoid paying taxes.

2.9. Political influence and lobbying

- 2.9.1. We do business in accordance with the principle of transparency. Where relevant, we engage in lobbying to protect and promote our interests. Any lobbying activities may only be conducted in strict compliance with transparency and integrity and in accordance with applicable legal regulations.
- 2.9.2. Any civil or political involvement of our employees must not interfere with the timely and satisfactory performance of their work, must not damage the reputation of the AGROFERT Group and must not misuse the assets and resources of AGROFERT Group companies for such purposes. Employees are required to refrain from any conflict of interest or activities that conflict with their work and activities performed for the AGROFERT Group.

2.10. Protection of competition and fair trading principles

- 2.10.1. For us, compliance with competition law is not just a legal obligation, it is a central element of our corporate culture and our responsibility towards our customers, suppliers and consumers.
- 2.10.2. We embrace competition with respect and are confident that we can achieve continued success in the markets in which we operate without prohibited agreements restricting competition and without unlawful concerted practices, simply by improving the quality of our products and services.
- 2.10.3. We undertake to comply with applicable competition law, in particular antitrust law, and to consciously and actively assume our responsibilities in this regard.
- 2.10.4. Exchanging information with competitors about prices, markets, costs or other non-public strategic information may lead to concerted practices that are prohibited, and we therefore refrain from such behaviour and actively distance ourselves from it.
- 2.10.5. We actively oppose discussions or resolutions at association meetings that focus on prohibited anti-competitive conduct, particularly when they take place at events in which we participate.
- 2.10.6. We also comply with antitrust rules when dealing with our downstream business partners, particularly those who sell our products in their own name and on their own account. In this context, in particular, it is prohibited to determine resale prices (e.g. setting minimum prices for resellers) or entering into agreements that restrict resellers, for example, prohibiting them from supplying customers outside of their assigned sales area, if customers have approached the resellers without actively addressing them beforehand.
- 2.10.7. If any of the AGROFERT Group companies has a dominant position on the market for a particular product according to applicable legislation, we do not abuse this position. A company is dominant if, as a provider or buyer of a particular type of goods or services, it has no competitors at all or holds a significant position in relation to its competitors. Here we follow the rules designed to ensure equal treatment of customers.
- 2.10.8. Due to the sensitive legal implications, in particular potential heavy fines and/or claims for damage compensations, utmost care is required in competitive behaviour with regard to the

conduct of all employees. We coordinate any disputed competition cases with competition specialists in a timely manner so as to avoid violation of competition rules.

2.10.9. Detailed rules of competitive behaviour are set forth in a separate internal regulation.

2.11. Business negotiations, relations with suppliers

2.11.1. We sell our products and services based on their quality and price.

2.11.2. All trading operations must be approved in accordance with applicable internal rules.

2.11.3. Business relations must comply with generally binding legal regulations and are documented by the relevant documents.

2.11.4. In our business activities, we comply with applicable legal regulations in the area of measures against the laundering of proceeds of crime and terrorist financing, identify our business partners, accept only transparent business relationships and payments, and take other actions required by applicable law.

2.11.5. Any potential supplier who wishes to win a contract from us always expects honest and unbiased examination of their offer, which our employees who have procurement as part of their job description must respect; the same applies to the conclusion of commercial and sales contracts with our customers.

2.11.6. Suppliers competing for contracts shall not be given any unfair advantage or disadvantage, nor shall customers be disadvantaged in any way. Any discrimination in the selection of business partners and in the subsequent business relationship with them is strictly prohibited.

2.11.7. When selecting our suppliers, we also take into account, where possible, social and environmental criteria and, in particular, whether the supplier adheres to sustainable business principles in their value chain. The business relationship should only be concluded with business partners whose business complies with the principles set out in this Code of Conduct or the Code of Conduct for Business Partners, in particular (but not exclusively) the commitment to respect human rights, to comply with fundamental human rights documents and the sustainability principles set out in Article 2.1.2 of this Code of Conduct.

2.11.8. We only enter into business relationships with partners whose reputation and legitimacy of their business are not doubted and whose funds come from legitimate sources. We do not engage in activities that could assist a third party in carrying out potentially illegal activities. The manager responsible for the business relationship is obliged to perform background checks on our business partners and shall not enter into a business relationship if there is any doubt or potential reputational risk.

2.11.9. We emphasize fair relations with our business partners and compliance with agreed contractual terms.

2.11.10. In our relations with all our suppliers, we ensure timely payment in accordance with the agreed payment terms and applicable law. We place increased emphasis on timely payments to suppliers who are small or medium-sized enterprises.

2.11.11. We comply with applicable laws, rules and controls relating to international trade, import and export of goods, software and technology, including international sanctions (e.g. restrictions on trading certain types of goods with certain partners).

2.12. Business courtesy and anti-corruption behaviour

- 2.12.1. We maintain zero tolerance for any form of corruption and bribery or any fraudulent behaviour. Corruption behaviour is not only socially unacceptable but also constitutes a criminal offence with potential heavy fines and penalties both for the company and for the individuals involved.
- 2.12.2. Employees are obliged to unconditionally respect the applicable anti-corruption regulations. It is prohibited to engage in activities that could be perceived as corruption or influencing a partner in order to gain an unjust advantage for the company or the AGROFERT Group. We expect the same attitude towards bribery and corruption from our business partners, intermediaries or agents and representatives.
- 2.12.3. Employees may not directly or indirectly (using third parties) offer, give, request or accept bribes or gifts and favours that could be construed as a bribe or special advantage. Only corporate gifts of reasonable value may be accepted and given. Other gifts must be tactfully declined.
- 2.12.4. An employee may only accept and offer an invitation for a treat of reasonable value or where refusal of the invitation would be contrary to the principles of courteous conduct in the particular setting.
- 2.12.5. Caution is also appropriate for activities such as invitations to events, excursions, conferences, etc., which may only be given or accepted as part of official company business (never separately) to the extent reasonable for legitimate business purposes, as long as they are consistent with common business courtesy or customary industry practices and as long as they exclude the appearance of improper influence.
- 2.12.6. We are committed to prompt, independent and objective investigation of all incidents of corporate conduct, including corruption and bribery, in accordance with the procedures established in the Compliance Program and this Code of Conduct.

2.13. Dealings with the public sphere

- 2.13.1. When dealing with representatives of the public sphere (public officials, authorities, elected representatives), employees are obliged to respect the relevant generally binding legal regulations as well as other rules defined by the company or by the public sphere to prevent corruption and conflicts of interest of the public sphere representative.
- 2.13.2. So-called facilitation payments¹ (i.e. payments to expedite certain official acts, with the exception of official office fees), which may be illegal under the applicable laws of the country concerned, are prohibited.
- 2.13.3. Employees respect the rules and regulations for grants, tenders and other contracts of state and public institutions. They provide truthful and unbiased information in communications and documents. It is prohibited to influence representatives of these institutions in any way in order to obtain an unjust advantage.

¹ Exceptions are situations where there is an imminent threat to life and property (failure to obtain a business contract, business problems, project delays are not considered imminent threats).

2.13.4. Any negotiations and communication with representatives of organisations with links to the public sphere during a public tender or grant award process shall only take place within the scope of the legal regulations and the employee is not entitled to maintain above-standard relations with persons influencing decision-making in such cases.

2.14. Donations, sponsorship and charitable activities

2.14.1. We provide earmarked monetary and in-kind donations to finance science and education, culture, schools, fire protection, support and protection of youth, protection of animals and their health, social, healthcare, environmental, humanitarian, charitable, physical education, sports, etc.

2.14.2. AGROFERT Group companies follow the following rules when making donations:

- in principle, they do not grant requests from individuals, nor do they provide payments (not even small amounts) into private bank accounts; exceptions to this rule may be approved by the company's Board of Directors, taking into account social or other aspects of the request;
- they do not make any contributions to persons or activities where their support could conflict with the interests or damage the reputation of AGROFERT Group companies;
- the recipient and the purpose of the donation and the specific use to which it will be put by the recipient are known;
- the use of the donation must be evidenced at any time by means of presentation of receipts;
- it is prohibited to accept and provide gifts/contributions given as compensation for a specific work or service that significantly exceed the value of that service.

2.15. Conflict of interests

2.15.1. Employees are obliged to ensure that in the course of their work activities they do not get into conflict between their private interests and the interests of AGROFERT Group and to consistently avoid any situation that could create an actual, perceived or potential conflict of interests.

- Employees are obliged to report to their supervisor any personal interests that could affect the assignment and implementation of their work task (i.e. demonstrate their independence from the work task – such risks of conflict of interest and possible bias are personal or professional ties/relationships of the employee and persons close to him/her with the employees/beneficiaries of a business partner, engagement of the employee or his/her close person in the income of a business partner, personal business relationships of individual nature², family or intimate non-work relationships of employees who are in a relationship of superiority and subordination to one another, or

² The term individually means individually agreed business terms, prices or discounts in a private business relationship with that partner; e.g. in the construction industry, where individual deliveries of work are individual agreements (i.e. if an employee influencing the order of a given company for the employer also uses the deliveries of that company privately). In the case of services and goods offered generally, without individual discount options, which are governed by standard rules and price lists, and the same terms and discounts are commonly offered to the public, this conflict of interests is not expected – e.g. it is not a conflict of interests to have a standard tariff with the employer's mobile operator commonly offered to the public or a current account under standard terms and conditions with a bank that provides financial services to the employer.

of persons where one can influence the career advancement or evaluation of the other, or where one person has a controlling position over the other).

- The employee's supervisor shall always assess the risk of a conflict of interest and decide on additional measures (e.g. measures in the area of control and approval of the business relationship or transfer of responsibilities for the relationship with the given business partner to another employee) and shall mandatorily submit a written report to the relevant Compliance Officer of the company with information about the conflict of interests and its resolution.
- Employees must not place any personal orders or enter into business with companies with which they have a business relationship if this could result in certain benefits not normally offered to the public – particularly where the employee has or could have direct or indirect influence over the procurement of that company. The conclusion of such a transaction by a person close to the employee where an individual advantage arises may also constitute a potential conflict of interests.
- If employees are in doubt as to whether an activity constitutes a potential conflict of interests, they are required to consult with their supervisor, HR officer, legal counsel or the company's Compliance Officer.

2.15.2. It is also a conflict of interests to unethically disclose business information, recommendations, know-how and other information of AGROFERT Group that may assist the profitable or competitive activities of other persons.

2.15.3. A potential conflict of interests does not automatically constitute a violation of the Code of Conduct, but a failure to disclose it does.

2.16. Ancillary activities and non-competition

2.16.1. Each employee is required to perform their job duties with full commitment and to use their best knowledge and skills to perform their duties. Ancillary activities which adversely affect the performance of this duty and are contrary to applicable legal regulations are not permitted.

2.16.2. It is only possible to engage in other profit generating activity that is identical to the employer's business with the employer's prior written consent. If an employee's ancillary profit generating activity could lead to a conflict of interests with the interests of the employer, it is in the employee's own interest to consult engaging in such profit generating activity the HR department of the employer in advance or to seek the employer's consent for such activity in order to ensure that the intended ancillary activity is in compliance with the Code of Conduct and that it cannot constitute violation of applicable legal regulations.

2.16.3. Members of corporate bodies are obliged to comply with the statutory and contractual rules on conflicts of interests and non-competition, including where their interests conflict with the interests or business of other Group companies. In any case of a conflict of their interests or breach of the non-competition clause or threat thereof, they are is obliged to notify the company.

2.16.4. Every employee and member of a corporate body who participates in any way (even through a close person) in companies³ that are in business or competitive relations with AGROFERT Group companies is obliged to report this fact in writing to the relevant Compliance Officer of the company, who will evaluate the possible conflict of interests.

2.17. Financial reporting and controls

2.17.1. We place emphasis on fair and truthful disclosure of information in relation to investors, customers, business partners, the public, government institutions and colleagues.

2.17.2. All reports, statements, data compilations, or drawings for internal and external use must be correct, consistent, compliant with applicable legal regulations, and correspond to reality.

2.17.3. In accordance with the principles of proper accounting, the data must be complete, correct, relevant over time and give a true and fair view to the individual recipients and third parties. The data must also be correctly recorded in the economic and administrative software, which also applies to the accounting of sponsorship donations.

2.17.4. All transactions must be adequately recorded and documented. Defined processes and controls must ensure that all transactions are carried out according to established rules and approval mechanisms and that any unauthorised, undocumented, illegal or unauthorised transactions and payments, attempted embezzlement, misuse of assets or tampering with the accounting records are identified.

2.18. Asset protection and management, intellectual property protection

2.18.1. Employees must use assets of AGROFERT Group companies efficiently, treat them with due care and protect them against loss, theft, misuse, damage or vandalism. Company assets include tangible assets, production technology, buildings, vehicles, financial resources and equipment such as IT equipment and office supplies, as well as intangible assets, IT systems and software, confidential information, know-how and company knowledge.

2.18.2. Company assets may only be used for work purposes, unless the employer accepts other personal use of certain property (e.g. use of mobile phones, internet within the company premises or company vehicles). Such use should be occasional, in accordance with the law, and may not be unethical, interfere with work activities and constitute misuse for other profit generating activities.

2.18.3. Theft or fraudulent conduct involving company assets is considered a gross violation of the Code of Conduct in all circumstances.

2.18.4. We take measures to protect our intellectual property and respect the right to protect the intellectual property of other parties.

³ Equity interest, interest in the control and management of an enterprise, beneficiary, member of a corporate body, employment or other profit generating relationship, consultant. Ownership of a share through collective investment vehicles (mutual funds and other investment funds) is not considered a conflict of interests.

2.19. Trade secrets, confidentiality and information security

- 2.19.1. We take care to protect trade secrets and other confidential information. Unless authorized by an authorized person, an employee may not disclose or share with unauthorized persons any information that comes to their attention in connection with the performance of their job. They are required to protect such information and take care to prevent inadvertent leakage.
- 2.19.2. These include, in particular, trade secrets, the company's relationships with members of the Group, business methods and practices, pricing policies, business plans and marketing strategies, terms and conditions of contracts, information on the financial and volume indicators of the traded products, goods and services, the state of financial resources and the course of financing, pre-publication accounting statements, the working and salary conditions of the company's employees, any personal data, etc. Similarly, the employees must also protect the data of third parties or business partners to which they gain access in connection with their work for AGROFERT Group companies. A breach of this obligation would significantly violate the legitimate interest of the company or a third party in the protection of such data and would expose the company to the risk of damage. The confidentiality of the information survives the termination of employment.
- 2.19.3. We take care of security in the use of information technology. When using IT technology, employees observe the principles of safe use of IT technology and systems, protect relevant files, technology, passwords and access rights to prevent unintentional leakage of information or breach of IT security of the employer's or third party's infrastructure and equipment.
- 2.19.4. When using artificial intelligence, we respect the principles of data protection, personal data, security, legality, transparency, integrity and confidentiality. All management of applications using AI must always remain under human control.

2.20. Protection and handling of personal data

- 2.20.1. We comply with applicable data protection laws and other privacy laws in force in the Czech Republic and other countries where we operate. We process personal data only for legitimate purposes and on the basis of a proper legal title arising from the relevant legislation and contractual relationships, or on the basis of the consent of the data subject.
- 2.20.2. Employees are required to be familiar with applicable laws, policies on the collection, use, transfer and storage of personal data and must ensure compliance with them and provide comprehensive protection for all personal data collected by AGROFERT Group.

3. COMPLAINTS AND SUGGESTIONS

- 3.1. According to the applicable employment-law and organisational rules, employees should, where possible from their point of view, use internal means to settle any disputes they may encounter in the course of their work through the labour procedure.
- 3.2. Each employee of the AGROFERT Group may raise concerns, complaints or point out circumstances that may lead to the conclusion that a violation and/or breach of this Code of Conduct and/or the Sustainable Business Policy has occurred with their supervisor, head of the HR department, legal counsel or the Compliance Officer of the relevant AGROFERT Group company.

- 3.3. Another tool for reporting and resolving potential violations is the Ethics Hotline, where any employee, as well as any other person (business partner, consumer or end user of products or services, the public, etc.) can report any observations or reasonable suspicions of unethical behaviour or violations of other AGROFERT Group policies:

<http://www.agrofert.cz/compliance/>

or by calling +420 272 192 999

- 3.4. Every complaint recorded at any level of the team by the Compliance Officer or the AGROFERT Group Ethics Hotline shall be properly, promptly, independently and objectively investigated and, if necessary, corrective or preventive measures shall be adopted for the future.
- 3.5. All documents relating to the investigation are confidential.
- 3.6. Any retaliatory, discriminatory or other negative action against a person who has made a good faith complaint or otherwise raised a concern about a violation of the rules, whether through the COMPLIANCE PROGRAM and the Group Ethics Hotline or any other channel within the company, is not permitted or tolerated. A person who has knowingly made a false report cannot claim protection.

On Prague, on 27 March 2025



Ing. Josef Mráz
Vice-Chairman of the Board of Directors
of AGROFERT, a.s.



JUDr. Alexej Bílek, CSc.
Member of the Board of Directors
of AGROFERT, a.s.

This Code of Conduct was issued on 1 September 2011 (current revision valid from 27 March 2025) and approved by the Board of Directors of AGROFERT, a.s. as binding for its employees and for the entire AGROFERT Group. It forms a part of the internal regulations of AGROFERT, a.s., which sets out details, including the implementation of the rules, training of employees and the method of control.