



CORPORATE COMPLIANCE POLICY

Principles of Ethical Behaviour in the AGROFERT Group

AGROFERT, a.s. and its daughter companies accepted in the context of its activities the guidelines for ethical behaviour (Business Conduct Guidelines) which are in compliance with the corporate policy bellow:

- when doing business, the group respects antimonopoly and competition laws in the belief that only fair competition may freely develop the company,
- as regards the manufacturing and business activities, the group guarantees the recognised quality standards and health care quality standards of production, environment protection and sustainability.

AGROFERT, a.s. based its Business Conduct Guidelines on clear and brief principles which are encouraged by the applicable internal regulations in which the individual areas of Ethical Code of Conduct binding for all employees and daughter companies are defined.

AGROFERT, a.s. considers appropriate to declare that its activities respect the bellow mentioned rules of conduct which are a common standard in the European business, and requires its employees to respect them.

The following principles are in the context of the approved Ethical Code of Conduct consistently supported:

- democratic values, protection and observance of human rights according to the Charter of fundamental rights and basic freedoms,
- rights of every human being without distinction based on origin, race, color of skin, mother tongue, age, sex, marital status, state of health, sexual orientation, economic situation, religious or political opinion, social status,
- principals of equal approach to employees, respect to human dignity, privacy and individual rights of every person,
- activities of employees in compliance with national law,
- principals of the care about living and working environment and its sustainable development in all relevant areas,
- decent working conditions,
- principles for observance and maintaining safety at work and principles of health protection, rules related to work equipment and personal protective equipment for employees.

AGROFERT, a.s. demands that its employees:

- respect the rules of law concerning the measures against legalisation of criminal proceeds and terrorist financing according to the relevant internal regulation,
- do not conduct negotiations with the business partners which breach the competition rules and do respect internal regulations containing the guidelines for the fair economic competition,

- do respect the applicable laws and regulations of the country where each daughter company of AGROFERT, a.s. has its registered office,
- are impartial and objective as regards the handled matters and refuse any pressure, influence, wishes or requests, gifts or favours that could undermine their impartiality,
- avoid any conflicts of interest while doing their work, or potential conflicts of interest that could occur and inform their superiors without any delay,
- if any crisis or non-standard situations occur which demand legal or insurance assistance and which should be announced and discussed with the AGROFERT, a.s. management (reporting of extraordinary events, dangerous situations and conditions), they immediately act in line with the internal regulations (legal orders of AGROFERT, a.s.) to remove or reduce potential damage or moral consequences of the event without any delay,
- if they find out any suspicious circumstances referring to the fact that there is a possibility of creation of any financial, business, technical, safety, moral, social or environmental harm or if any employee, commercial or non-commercial partner or any third party has any doubts whether the particular matter is in line with the principles of ethical behaviour or any third party has any doubts whether the particular matter is in line with the principles of ethical behaviour of the AGROFERT Group, they have the right and duty to turn to their superiors or the line **Tell Us** at:

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

where it is ensured that all communications, complaints or warnings are professionally, impartially and discreetly investigated.

The following standards of ethical behaviour shall be treated as normal in the AGROFERT Group:

- to respect the guidelines of the Conditions of employment and internal regulations which are individually modified according to the activities of each daughter company,
- to protect the property of the AGROFERT Group and not to use it for the own need or the need of another person and to use it only to the extent specified in the internal regulations and with the superiors permission,
- to respect the rules of loyalty towards the employer, not to misuse the job position, knowledge, confidential information, personal contacts gained while performing the job to the detriment of the AGROFERT Group, for the own benefit or the benefit of third parties,
- to be aware of responsibility to the extent of individual job positions, to act as a responsible partner, to give priority to professional responsibility over private interests,
- to perform the job honestly, decently, conscientiously, objectively, without unnecessary delays, correctly, responsibly, helpfully, with the due care, rationally, in cooperation with other employees, meaningfully, proactively with regard to the anticipated goals and plans of the employer,
- to take care of the protection of used and processed datas in the AGROFERT Group and to prevent their misuse for someone else benefit, to entrust the data files and document files only to persons authorized for such an activity,
- to act in the public in the way not damaging good reputation of the AGROFERT Group by undesirable activities, behaviour and acting.

In Prague, on 8. 4. 2021


Ing. Zbyněk Průša
 Chairman of the Board of Directors
 of AGROFERT, a.s.


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

This Compliance policy was issued on 1. 9. 2011 (in the current revision on 8. 4. 2021) and it was approved by the Board of Directors of AGROFERT, a.s. as binding for its employees and for the whole AGROFERT Group. It is part of internal regulations of AGROFERT, a.s. that provide details including the implementation of guidelines, employee training and the means of control.