



# **COMPLIANCE ORGANIZATION** **POLICY**

## **Principles of ethical behavior in the AGROFERT Group**

**AGROFERT, a.s. and its daughter companies accepted in the field of their activities the guidelines for ethical behavior (Business Conduct Guidelines) which are in line with the company policy defined below:**

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

**AGROFERT, a.s. based its Ethical code of Conduct on clear and brief principles which are supported by valid internal regulations in which the individual areas of the Ethical code of Conduct binding for all employees and daughter companies are defined.**

**AGROFERT, a.s. deems advisable to declare that its activities respect the bellow mentioned rules of conduct, which are a common standard in the European business, and requires their observance by its employees.**

**In the framework of the approved Ethical Code of Conduct the following principles are consistently supported:**

- democratic values, protection and observance of human rights in line with the Charter of fundamental rights and basic freedoms
- rights of all individuals irrespective of their national or ethnic origin, race, color of their skin, mother tongue, age, sex, marital status, state of health, sexual orientation, economic situation, religious and political opinion, social status,
- principals of equal approach to employees, their dignity, privacy and personal rights,
- activities of employees in line with legal regulations,
- principals of the care about living and working environment and its sustainable development in all spheres of activity,
- dignified working conditions for employees,
- rules for observance and maintaining safety at work and principals of health protection, rules related to work equipment and personal protective equipment for employees.

**AGROFERT, a.s. also demands that its employees:**

- observe the rules of law concerning actions against legalization of proceeds of crime and terrorism financing according to the valid internal rule,

- do not conduct negotiations with the business partners who breach the competition rules and observe internal rules containing the rules of fair economic competition,
- observe valid legal 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, presents or advantages that could jeopardize their objectivity,
- 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 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 order 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 behavior 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 common standards of ethical behavior in the group AGROFERT, a.s. are considered as follows:**

- to observe the guidelines of the Conditions of employment and company internal rules which are individually modified according to the activities of each daughter company,
- to protect the property of AGROFERT Group and not to use it for own need or the need of another person or to use it only to the extent specified in the company internal rules and in accordance with the superior's permission,
- to obey 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, to own benefit or 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 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, behavior and acting.

In Prague, on 17.10.2013

**Ing. Josef Mráz**

Executive Director of AGROFERT, a.s. according to the mandate of the Board

*This Ethical Code of Conduct was published on 1.9.2011 (formal revision on 20.4.2014), 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 a part of internal rules of AGROFERT, a. s. that provides details including implementation of rules, training for staff and the means of control.*