



CODE OF CONDUCT FOR BUSINESS PARTNERS OF AGROFERT GROUP

1. INTRODUCTORY PROVISIONS

- 1.1. At AGROFERT, we are fully aware of our social responsibility. We are guided by high standards of ethical behaviour and sustainable business, which are embodied in the Code of Conduct implemented in all our companies.
- 1.2. We also consider responsible selection of business partners to be part of our responsible approach. For the purposes of this regulation, a business partner means any individual or legal entity outside the AGROFERT Group with whom an AGROFERT Group company has entered into a contract (e.g. suppliers and service providers, intermediaries, agents, representatives, advisors, customers, hereinafter referred to as “business partners”). We select our business partners in a fair and non-discriminatory manner, taking into account not only economic criteria but also expecting them to behave in accordance with ethical, sustainable and occupational health and safety principles and international and European human rights instruments and conventions. In order to establish minimum standards of business conduct that we expect from all of our business partners, we issue this Code of Conduct for AGROFERT Group Business Partners (hereinafter “Code of Conduct for Business Partners”).
- 1.3. We expect our business partners to make their relevant staff aware of the rules contained in this regulation and to exercise reasonable efforts to enforce compliance with these rules in their own supply chains, particularly with their immediate business partners.
- 1.4. In the event that any of the provisions set out in the Code of Conduct for Business Partners is in conflict with the contractual arrangements between the business partner and a company of the AGROFERT Group, the contractual arrangements shall prevail.

2. BASIC OBLIGATIONS

2.1. Acting in compliance with the law

Compliance with applicable legislation is one of the guiding principles of AGROFERT Group. We expect our business partners to act in compliance with the laws and regulations in force and in effect in their country of domicile and in all countries in which they operate, as well as the valid and effective EU regulations and international treaties. We expect business partners not to tolerate any unlawful conduct.

2.2. Respect for human rights, sustainability and business ethics

Respect for human rights, ethical conduct and business sustainability are essential to us. We expect our suppliers:

- to respect human rights and comply with the principles of doing business as set out in international and European instruments and conventions on 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;
- to implement internal policies and procedures to prevent human rights violations and take prompt and effective remedial and preventative action for the future when such violations occur.

2.3. Non-discrimination and employee protection

We expect our business partners:

- to ensure equal and non-discriminatory conditions for employees and other co-workers, regardless of age, race, ethnic origin, colour, nationality or social background, religion, gender, marital status, sexual orientation, gender identity, political opinion, disability or handicap; and to prohibit any other forms of discrimination covered by EU and national law, including sexual and other harassment as a specific form of discrimination;
- not to tolerate violence, threats, insults, intimidation, any kind of assault or aggressive behaviour, behaviour that creates hostile atmosphere or other inappropriate behaviour at the workplace;
- to respect differences and diversity of individuals;
- to adhere to the minimum age for employment in their places of operation and to reject the use of child labour, forced or compulsory labour and all forms of modern slavery and human trafficking, both in their own operations and those of their business partners;
- to respect human dignity, privacy and personal rights of each individual;
- to take the same approach to their core staff and seconded staff, including employment agency workers;
- to recognize the rights of employees to freedom of expression, freedom of association, to respect the employees' right to join, form or not join a trade union without fear of reprisal, intimidation or harassment, and the right to social dialogue;
- to respect applicable minimum wage laws, provide fair and equitable wages, including equal pay for men and women workers for equal work or work of equal value, benefits and other working conditions in accordance with applicable laws in their place of business and international standards and conventions;
- to respect the statutory working hours for the given jurisdiction and the right to rest;
- in the event of intervention by private or public security forces, to ensure that the human rights of employees and others are respected (i.e. to prevent unlawful physical or psychological violence);

- to comply with applicable legislation and international conventions in the field of occupational health, occupational safety rules and rules for the safe operation of technical equipment, to provide appropriate protective equipment, training, to improve working conditions and to take other measures to monitor and reduce occupational health and safety risks.

2.4. Responsibility towards communities and customers, quality and health safety of products

We expect our business partners to behave responsibly towards their customers and the communities and regions in which they operate:

- to monitor the impact of their activities and take appropriate account of the views and interests of the community;
- to seek to avoid, mitigate or remedy the negative impacts of their activities and prevent them from occurring in the future;
- to respect the rights of vulnerable groups, local communities and indigenous peoples in places where they are affected by their business;
- to ensure that their products and manufacturing processes meet legislative and regulatory requirements for quality, safety and health, implement appropriate quality management and control systems, and implement all necessary corrective and preventive measures in this area;
- to provide full, accurate and clear information on the content, composition, health, safe use, maintenance, storage and waste management of the products and services they sell, to the extent appropriate;
- to use honest and responsible business, marketing and advertising practices and procedures in connection with the sale of products or the provision of services and to reject any deception, misrepresentation, fraudulent, unfair or dishonest practices with respect to consumers and end users;
- to exert reasonable efforts to ensure that they do not use raw materials in their 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;
- to report any problems in the quality and safety of their products and services immediately to the relevant authorities and affected business partners and to implement all necessary corrective and preventive measures.

2.5. Environmental protection

We expect our business partners to respect environmental protection:

- to comply with applicable legislation and international conventions relating to environmental protection and the prevention of environmental accidents;
- to hold and maintain all necessary official permits, licences and registrations in this area and comply with the conditions and requirements set out therein;
- to monitor the environmental risks associated with their products and services and their impacts, incorporate into their internal policies and procedures requirements to prevent

- and minimise environmental risks and reduce negative environmental impacts, and transparently communicate the environmental impacts of their products and services;
- to place emphasis on the protection of nature, biodiversity, soil and water resources;
 - to ensure the welfare and well-being of animals and not tolerate abusive, negligent and inhumane treatment of animals in their operations and supply chains;
 - to 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;
 - to strive to minimise emissions to soil, water and air that can cause pollution or contribute to climate change;
 - to support responsible and sustainable sourcing of raw materials;
 - to 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;
 - to strive to continuously improve environmental protection.

2.6. Protection of competition

Compliance with applicable competition law is not only a legal obligation for us, but a core element of our corporate culture and part of our social responsibility. We therefore require our business partners to act in accordance with applicable competition law.

2.7. Transparency in business relations and anti-corruption behaviour

We expect our business partners:

- to treat their business partners fairly, not to unfairly favor or disadvantage them in any way, and not to practice any form of discrimination in their dealings with them. When selecting their suppliers, they also take into account, where possible, social and environmental criteria, in particular commitments to respect human rights and sustainability principles;
- to fulfil their obligations to their business partners, the state or other public institutions properly and to act lawfully and honestly in their business relationships at all times;
- to maintain zero tolerance for any form of corruption and bribery or any fraudulent behaviour;
- not to directly or indirectly (through the use of third parties) offer, give, solicit or accept bribes or gifts, invitations, treats or attention that could be construed as a bribe or special advantage;
- to respect the rules and regulations for grants, tenders and other contracts of state and public institutions and not to influence representatives of these institutions in any way to gain unjust advantage;
- to avoid any activity or situation that may lead to a conflict between the private interests of the business partner's employees or other representatives and our interests, and to promptly disclose to us any conflicts of interests that may affect our business relationship;

- to adopt measures against the laundering of the proceeds of crime and terrorist financing and to comply with the legislation applicable in this area;
- to comply with applicable laws, rules and controls relating to international trade, import and export of goods, software and technology, including international sanctions.

2.8. Intellectual property, confidentiality, protection of assets and data protection

We expect our business partners:

- to protect trade secrets and confidential information that they learn or obtain in the course of our mutual business relationship;
- to respect and protect the intellectual and industrial property rights of AGROFERT Group companies and third parties;
- to protect, in the course of their activities, the assets of AGROFERT Group companies from theft, damage or misuse;
- to act in compliance with applicable data protection and other privacy laws;
- where they design, develop and use AI to carry out activities with AGROFERT Group, to respect the principles of data protection, privacy, security, legality, transparency, integrity and confidentiality and to ensure that the development and use of AI applications comply with applicable legislation and that the systems are reliable, bearing in mind that all management of these applications must remain under human control at all times.

3. COMPLAINTS AND SUBMISSIONS

- 3.1. We expect our business partners to have mechanisms in place to safely raise complaints (even anonymously), concerns, or to point out circumstances from which it may be inferred that a violation of law, sustainability and/or ethical conduct has occurred, including independent investigation of relevant complaints and protection of the person making the complaint from retaliation.
- 3.2. Any person, including employees of a business partner or third parties, may contact a responsible employee of an AGROFERT Group company in the event of a breach of these rules. If this is not possible (e.g. they are involved in the conduct in question or for other reasons), they may contact the independent Compliance Officer of the relevant AGROFERT Group company or file a complaint directly with the AGROFERT Group Ethics Hotline:

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

or by calling **+420 272 192 999**

- 3.3. Every complaint recorded at any level of the team of Compliance Officers or at 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.

- 3.4. All documents relating to the investigation are confidential.
- 3.5. 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 is not permitted or tolerated. A person who has knowingly made a false report cannot claim protection.

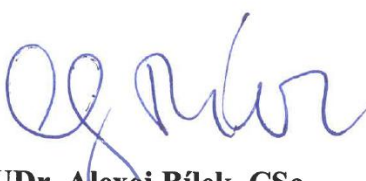
4. VIOLATION OF THE CODE OF CONDUCT FOR BUSINESS PARTNERS

- 4.1. We expect to be notified in a timely and appropriate manner by our business partner upon any suspicion or concern regarding a breach or other violation or non-compliance with the standards set forth in this Code, allowing for joint fact-checking and remediation.
- 4.2. We reserve the right to monitor and verify whether the business partner complies with the provisions of the Code of Conduct for Business Partners, for which the business partner shall provide the necessary cooperation.
- 4.3. In the event of a reasonable suspicion of a violation of the Code of Conduct for Business Partners, the business partner shall provide an explanation or more detailed information regarding the suspicion under investigation, including information on whether and what measures the business partner has adopted to remedy and prevent it in the future. We are prepared to assist our business partners in this process. Where contractual relationships and applicable law allow, we reserve the right to suspend or terminate cooperation with a business partner who does not meet the standards set out in the Code of Conduct for Business Partners and is unwilling to take the steps necessary to meet them.

In 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.