

CODE OF CONDUCT



FirstFarms

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1. PREFACE

1.1 WHY DO WE HAVE OUR CODE OF CONDUCT?

FirstFarms' Code of Conduct is based on our values which are brought to life through outlining clear expectations to our everyday behaviour, as FirstFarms' employees. The Code is a guideline to our ethical behaviour within our organisation and regulates the relationship with our business partners, stakeholders, and local representatives in the communities in which we operate. Furthermore, it presents viable options for asking questions and voicing concerns if facing an ethical dilemma and also provides information on whom to contact when the questions or concerns arise.

1.2 FOUNDATION FOR THE CODE OF CONDUCT

The underlying basis for the Code is FirstFarms' values: **Responsibility, Passion, Respect.**

Our values are our beliefs, that guide our behaviour by putting assumption into practice. Our values are rooted in FirstFarms DNA, that introduces who we are and what to expect from us. Our DNA is presented in four main statements:

- **We manage agriculture with knowledge and ambitions.**
- **We manage agriculture with respect for the animals and soil.**
- **We manage agriculture with respect for people and surroundings.**
- **We manage agriculture with respect for our shareholders.**

In addition, we support the UN Universal Declaration of Human Rights and the foundation for Our Code of Conduct are The Ten Principles of the United Nations Global Compact. We support and act in accordance with its principles about Human rights, Labour, Environment and Anti-corruption.

1.3 TO WHOM DOES THIS CODE APPLY?

The Code is equally applicable to everyone in the organisation - at all levels. All full-time and part-time employees, permanent and temporary employees, trainees, students, volunteers and external consultants must adhere to the requirements, that FirstFarms' Code of Conduct contains.

1.4 WHAT TO EXPECT IF THE CODE OF CONDUCT WILL BE BREACHED

The breach of the Code and the adoption of behaviour that can be considered inappropriate might be the subject of disciplinary actions, that might result in the setting of a disciplinary commission. The disciplinary procedure will be in accordance with the local legislation and its final result could be the termination of the employment contract.

HOW A BREACH OF THE CODE OR SUSPECTED MISCONDUCT SHOULD BE REPORTED:

FirstFarms is a transparent company and therefore it is important that all persons to whom this code applies feel free to report about suspected misconduct. The persons that are suspecting any cases of non-compliance with FirstFarms procedures, DNA or Code of Conduct, are responsible to report about possible misconduct to the manager or manager's manager. If you rather report to the local HR responsible or Legal Adviser, you are welcome to do this.

If you are a manager, HR responsible or legal adviser, you are accountable to ensure that any concerns or issues that are reported are adequately addressed and investigated.

If you prefer to report anonymously you are recommended to report through our Whistleblowing-platform. You can find more information about our Whistleblowing-platform and what kind of disclosures may be reported through this channel in FirstFarms' Whistleblowing policy, that can be found on the FirstFarms' corporate website.

1.5 AN ETHICAL DECISION FRAMEWORK

FirstFarms' Code of Conduct is an ethical guideline, that supports the employees to take decisions in accordance with First Farms' DNA, policies and procedures. The decisions that FirstFarms' employees etc. take might have influence on the reputation and business of the company or even on the entire group. Therefore, if someone is in doubt regarding the consequences that their decisions may have or are facing an ethical dilemma, they should ask themselves 3 (three) simple question before making decision for acting:

1. Do I act legally?
2. Are my actions in compliance with FirstFarms DNA, Code of Conduct policies and procedures?
3. Am I prepared to be accountable for my actions?

If the answer is "NO" or is "UNSURE" guidance should be sought to one of the persons from your manager, manager's manager, unit's HR responsible or legal adviser.

1.6 COMPLIANCE WITH THE LAW

All employees of FirstFarms group must comply with the laws and regulations of the legal system where they are operating. FirstFarms' Code of Conduct is a supporting set of rules, norms and responsibilities, that outline company's expectation from its employees.

Any provisions of this Code of Conduct that are in conflict with legal requirements in force will be considered null and void.

This Code of Conduct will apply to all the companies in FirstFarms group and also to the companies that will enter into the FirstFarms group until new modifications and will be completed accordingly from case to case by the laws valid in the concerned countries. However, if the subsidiaries in the group have also a Code of Conduct that applies locally the present document will not cancel the local Code of Conduct but will only complete it accordingly.

2. HUMAN RIGHTS AND LABOUR

In FirstFarms we believe that people are our most valuable assets. The future development of our company depends on our employees' knowledge and ambitions. We are managing agriculture with respect to our people; therefore, it is important for us to treat people in the same way, without violating human and labour rights. Our company recognise and respects the International Bill of Human Rights and acts accordingly.

What to expect from us?

- We act in accordance with applicable laws and standards regarding human and labour rights and demands the same from our business partners.
- We do not accept any kind of violence at the workplace.
- We do not tolerate any kind of modern slavery and child labour in our company.
- We are an international company, and our strength is in our diversity. We are treating people equal without discrimination, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. We do not accept any kind of unethical and disrespectful behaviour, discrimination, bullying and sexual harassment.
- We are providing equal pay for equal work, without any discrimination. We only permit working hours and salaries according to the local legislation.
- We employ only employees with working permits issued by official authorities.
- We respect and recognise our employees' freedom for association, the right to collective bargaining and strike according to law.
- We are encouraging our employees to feel free to express their opinion, in order to improve working condition and create even better workplace.
- We are securing safety at workplace and provide necessary equipment to conduct activities according to the health and safety legislation.

What does it mean for you?

- If you are witnessing breach of any of the above-mentioned principles of respecting the human and labour rights, you must report it immediately through one of the channels you have been introduced in this document.
- We are also expecting that you are promoting kindly and respectful behaviour to your colleagues.
- You are obligated to avoid any kind of discrimination and comply with all FirstFarms' human rights and labour rights.
- You are responsible to look after your own and your colleagues' safety and be aware of safety issues. If you feel that the work that you are conducting is unsafe, it is your right and responsibility to stop working and report your considerations through one of the channels you have been introduced above. To help us to improve safety in our production, we are encouraging you to report on any conditions that may present safety hazard.

3. ENVIRONMENT

Our business is deeply depending on and influenced by the environmental conditions. We are aware, that our operations have an impact on the environment. To be able to develop our business we need to take care of our surrounding. Animals and soil are other important actives that we are committed to treat properly and with respect. More about our company's approach on environmental issues can be found in the FirstFarms' environmental policy.

What to expect from us?

- We are supporting selected FN's sustainable goals, in order to contribute to more sustainable world and counteract environmental challenges.
- We are complying with local environmental legislation in all our operations. If our operations, by accident have made a dangerous impact on the environment, we are immediately reporting it to the local authorities.
- In case of environmental accidents, we immediately conduct all the necessary procedures to avoid further damaging.
- We are encouraging our employees, customers, partners and other stakeholders to be creative and come up with their ideas, how we can improve our operations in order to be a more sustainable company.
- We are supporting the diffusion of climate friendly technologies and use them where it is possible in our operations.
- We are treating animals with respect and according to the defined Animal welfare policy.
- We strive to be a good neighbour to the people who are living in local communities, where we operate and to take care of our surroundings.

What does it mean for you?

- If you witness breach of any of the above-mentioned principles regarding the environment, you must immediately report it through one of the channels you have been introduced above.
- You are obligated to ensure that all necessary procedures are conducted in order to stop the environmental damage. In this case, yours and your colleagues' safety has the highest priority. If you are not able to make decision alone seek for guidance from qualified persons within the company.
- If you have any ideas to how our company could be more sustainable and be able to decrease our operations' environmental impact, you are always welcome to come with your ideas for improvement.
- If you are working with animals, we are expecting that you treat animals with respect and do not intentionally harm them physically.
- If you are experiencing, that somebody in a local community is unpleasant with our company's operations take your considerations further to your manager or other responsible employees presented above.

4. ANTI-CORRUPTION

We manage our company with respect to our shareholders and we appreciate the trust they show to our company. FirstFarms as a company complies with local applicable laws regarding corruption, fraud and bribery. FirstFarms as a company has “zero tolerance” to any of our employees, who is involved in any kind of corruption, bribe, fraud or other illegal agreements, that may entail serious consequences for FirstFarms. Besides this we are expecting that our business partners accept our principles of anti-corruption and comply with them.

What does it mean for you?

- You must act ethically and not get involved in corruption, bribe, fraud case or other illegal agreements.
- You must not offer, promise, give, nor request / accept, presents of any kind of material benefits using the name or position held in the company.
- If you are suspecting that any of your colleagues is involved in corruption, bribe, fraud case or other illegal agreements, you are obligated to report through regular communication channels or through Whistleblowing platform.

5. FINAL PROVISIONS

- a) This internal regulation will be made known to all employees and is available at the head offices of each subsidiary in the FirstFarms group and FirstFarms' corporate website.
- b) Employees are entitled to request a copy of this document from the HR - responsible, legal adviser or manager.
- c) The provisions of this policy are valid for all the subsidiaries in the FirstFarms group (Appendix 1) and also for new subsidiaries that will enter into the FirstFarms group until new modifications.
- d) Any provisions of this policy that are not in accordance with the legal provisions in force will be considered invalid.

This internal regulation enters into force on February, 2021.

In Billund, on February, 2021

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Anders Holger Norgaard

APPENDIX 1

Subsidiaries in the FirstFarms group

FirstFarms A/S, a Danish joint-stock company, registered with the Trade Registry under the no. CVR 28312504, headquartered in Majsmarken 1, 7190 Billund, Denmark.

FirstFarms Agra M s.r.o., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 34 122 087, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sro, Insert No. 13205/B, the Slovak republic.

FirstFarms Mlyn Záhorie a.s., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 34 104 071, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sa, Insert No. 4869/B, the Slovak republic.

FirstFarms Mast Stupava a.s., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 36 529 401, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sa, Insert No. 2375/B, the Slovak republic.

FirstFarms s.r.o., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 35 916 346, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sro, Insert No. 34492/B, the Slovak republic.

MORAVA AGRO s.r.o., with its registered seat at Malé Leváre 469, Malé Leváre 908 74, the Slovak Republic, Id. Nr. (IČO): 35 920 653, registered in the Business register of the District Court Bratislava I., Section Sro, Insert No.: 34880/B, the Slovak Republic.

Obilná s.r.o. with its registered seat at Vinohrádok 5741, Malacky 901 01 the Slovak Republic, Id. Nr. (IČO): 54 084 438, registered in the Business register of District Court Bratislava I., Section Sro, Insert No.: 145035/B, the Slovak Republic.

FirstFarms Gabčíkovo, s.r.o., with its registered seat at Patašská 586 Gabčíkovo 930 05, Company ID no.: 35 844 761, registered with Commercial Register of the District Court Trnava Section: Sro, entry no.: 15266/T, the Slovak republic.

Gabčíkovo City land, s.r.o. with its registered seat at Patašská 586 Gabčíkovo 930 05, Company ID no.: 36 264 881, registered with Commercial Register of the District Court Trnava Section: Sro, entry no.: 15353/T, the Slovak republic.

FirstFarms Granero, s.r.o. with its registered seat at Vlasatice 419, 691 30 Vlasatice, BIN 454 78 295, recorded with the Commercial register maintained by the Regional court Brno, Section C, Insert No. 5080, Czech Republic.

FirstFarms Hungary Kft. with its registered seat at Gádoros, (5932 Gádoros, Tanya hrsz. 073/8.) recorded with the Commercial register maintained by the Regional court Brno, Section C, Insert No. 04-09-005726, Tax number: 12851157-2-04, Hungary.

FirstFarms Agro East s.r.l. with its registered seat at Surdila Greci, Garii Street, no. 1, Braila registered with the Trade Registry under reference number J09/220/2009 Braila, unique registration code (CUI) RO 15104360, Romania.

FirstFarms SRL, with its headquarter at Calea Sagului nr. 219, Com. Giroc, Loc. Chisoda 307221, Jud. Timis, registered at ORC J09/349/2012, fiscal code RO 21795228, Romania.

AISM SRL, with its headquarter at Str. Corneliu Coposu, nr. 2, Et. 3, Ap. 21, Jud. Satu Mare, registered at ORC J30/192/2006, fiscal code RO 18429294, Romania.

