CODE OF ETHICAL CONDUCT

Farm Frites Poland SA
Farm Frites Poland Dwa Sp. z o. o.

Version 5 of 1 May 2025

Table of contents

I. **Introduction** 2

1. Compliance with the law – the most important ethical standard

II. **Company and Employees** 4

1. Friendly and good place to work
2. Communication
3. Equal opportunities for employment, promotion, and professional development
4. Health and safety
5. Protection of privacy, information and secrets of the Companies
6. Recording of financial data
7. Taking care of property of the Companies
8. Conflict of interest and competitive activities
9. Offering and accepting undue advantage
10. Behaviour outside the place and time of work
11. Political commitment

III. **The Company and external environment** 9

1. Customers
2. Business partners
3. Local community
4. Environment
5. Competition

IV. **Principles of ethics programme management** 12

1. General provisions
2. Ethics Officer
3. Ethics Programme Coordinator
4. Ethics Council
5. Notifying violations of the Code
6. Glossary
7. Final provisions

Introduction

The basis for the business activities of Farm Frites Poland and Farm Frites Poland Dwa Sp. z o.o., hereinafter referred to as the **Companies**, is the Integrated Management System, which relies on the idea of sustainable development and social responsibility. Based on it, we operate in a responsible manner, taking care of our employees, minimising our environmental impact, as well as improving our management systems and responding to the needs of our environment.

The Code of Ethical Conduct sets out standards of conduct aimed at all employees of the Companies regardless of their position, time basis of employment, time and place of work.
It defines the principles by which the employees of the Companies should be guided in the workplace and in their external relations.

The purpose of the Code is to help us make the right choices by identifying the most important ethical standards and norms in our professional activities and social relations.

The Code covers a wide range of policies and procedures, but it does not exempt the employees from exercising their own judgement. Whenever we are in doubt about our own behaviour or that of our colleagues or the rules described do not provide sufficient guidance on how to act, we should speak to our immediate superior or the Ethics Officer.

First, however, ask yourself some questions. Is what I am about to do in accordance with the law, internal regulations, values of the Companies, and the Code? Can anyone be affected by my behaviour? Am I fully aware and willing to accept the consequences of this behaviour?

It is the responsibility of every employee of the Companies to familiarise themselves with the contents of the Code and to act in accordance with the rules contained herein. We also expect our business partners, in particular the subcontractors and the suppliers, to adhere to principles and values that coincide with those contained in this document.

1. Compliance with the law – the most important ethical standard

The Companies comply with laws, regulations and other applicable national, European Union and international legislation in every area of their activities. We comply with the industry requirements and local regulations, as well as the decisions issued by the national, regional and local authorities.
Our employees are also obliged to comply with the national and local laws.
The principles contained in the Code are binding, based on and consistent with the law, but they are not above the law, which every employee should adhere to in the first place.

Mission and values

OUR MISSION

Together and for generations, we are passionate about creating potato products to satisfy our customers.

OUR VALUES

OPENNESS – We embrace open dialogue and welcome new solutions, ideas, and opinions, even if they challenge our own. Our commitment to expressing our viewpoints honestly fosters an environment of openness and growth.

TRUST – We create an environment based on mutual respect, integrity, and ethics. We build transparent and long-term relationships with all partners.

ACCOUNTABILITY – We operate and develop in a sustainable manner. We take responsibility for our decisions, commitments and actions towards each other, our business partners, the environment, and the local community. We care about our own and our colleagues' safety. We honour our obligations.

EXCELLENCE – We are constantly learning and looking for new solutions. We are motivated to continuously improve, optimise processes, and maintain high standards in every aspect of our business.

COLLABORATION – We are a team that is committed to working with each other and all partners to achieve the set goals. We help each other in our daily work and recognise each other's needs. We focus on developing the best solutions.

Company and Employees

1. Friendly and good place to work

To work well and come to work with pleasure:

- We build positive relationships with colleagues, based on mutual respect, tolerance, and high personal culture.
- We do not accept bullying, discrimination, harassment, physical, sexual, and psychological abuse.
- We do not accept behaviour and expressions that violate personal interests of others or that lead to conflict and disrupt the good working atmosphere.
- We do not disclose private or false information concerning our colleagues or information that violates their dignity or reputation.

The rules of conduct regarding respect for dignity in the workplace, anti-bullying and anti-discrimination are set out in: "Standards for respecting dignity in the workplace, including the anti-bullying and anti-discrimination procedure" in force at the Companies.

For the creation and maintenance of a friendly and good workplace, the attitude of managers is crucial. The attitude of managers should be characterised by the highest ethical standards and compliance with the Company's laws and regulations. Supervisors at every level, in their relationship with the subordinate, are required to:

- Keep the subordinate informed of current plans, objectives and changes affecting his work in the Companies.
- Communicate and explain to the subordinate his tasks, the way in which he performs his duties and changes in the legislation relating to his position.
- Treat the subordinate as a partner and in a subjective manner, based on objective and fair criteria.
- Communicate the decisions or feedback to subordinates with justification.
- Clarify concerns relating to the Code or consult with the Ethics Officer.

More on the attitude and responsibilities of the managers, see Chapter IV of the "Standards for respecting dignity in the workplace, including the anti-bullying and anti-discrimination procedure" in force at the Companies.

2. Communication

We acknowledge that the friendly and open communication is the key standard leading to the proper functioning of the Companies, reduction of the risk of irregularities and the achievement and completion of business objectives. This is manifested in the following principles:

- We communicate by means of a dialogue. This is not only associated with achieving business goals, but also with building good relationships and a friendly atmosphere.

- We communicate with each other with respect for human dignity.
- Every employee has the right to an assertive attitude and assertive communication.
- Every employee, regardless of their position, has access to current information about the Companies to the extent necessary for the proper performance of its tasks.
- We create safe working atmosphere where everyone is listened to, can ask questions openly, and admit fearlessly when they are wrong.
- Every employee, regardless of its position, has the right to information that may affect its performance in the Companies.
- The information flow channels in the Companies must be tailored to the reception capacity of the employee in each type of position.
- Information on the position of the Companies on matters relating to its operations is communicated only externally through the spokesperson.
- We ensure proper communication with external companies working with the Company.

3. Equal opportunities for employment, promotion, and professional development

The employer provides equal professional opportunities to everyone:

- Applicants to the Companies are assessed only on their professional qualifications, competence, and ethical attitude.
- People employed by the Companies are assessed fairly, in terms of their skills, competence, and the quality of their work.
- We do not discriminate against anyone, in particular on the basis of gender, age, nationality, disability, beliefs, race, religion, sexual orientation, ethnic origin or employment status.
- We are not driven by prejudices and stereotypes about specific employee groups, but we use and respect the diversity of our workforce.
- We do not employ minors, prisoners and do not accept forced labour.
- Every employee has the opportunity to develop and improve their professional skills.
- We make employees fully aware of their responsibilities and the expectations of their position in a way they can understand.
- We share our knowledge and professional experience with the colleagues;
- Promotion decisions are made with particular care and on merit.

4. Health and safety

Health and safety of the employees and other people on the premises of our Companies is a priority. We are constantly striving to improve safety at work and are concerned about the health of our employees. Our goal is a total absence of accidents at work.

- We remember that each of us is responsible for the safety of ourselves and our colleagues.
- We comply with the law and internal procedures, instructions and policies relating to health and safety in the position we hold.
- We use the personal protective equipment required for the held position.
- We do not consume alcohol, take drugs or other intoxicants while at work or come to work under the influence of such substances.

- We report to the relevant persons or entities all violations of regulations as well as health and safety rules, accidents, injuries and uncontrolled release of hazardous substances into the environment.
- We aim at improving methods of hazard recognition, prevention of accidents at work and occupational diseases.
- We know the rules of behaviour in an emergency situation and warn those in the area of risk of the danger.
- We improve employees' health and safety skills and encourage them to get involved in improving working conditions.

5. Protection of privacy, information and secrets of the Companies

In the course of business operations, our Companies collect and store information on the employees, whistle-blowers, customers, suppliers and other business partners. This data is only obtained to the extent necessary to carry out the Companies' activities and is strictly protected.

- We comply with all employee privacy policies and requirements.
- We take care of the information security of the Companies, employees, and business partners.
- Confidential information is only made available to authorised persons.
- We do not disclose information that is a Company secret to third parties.
- In the event of unauthorised access to confidential information, we immediately inform our supervisor or the Ethics Officer.
- We do not process data that may contain confidential information in public places, e.g. restaurant, lift or train.
- The employee has the right to know the information collected and stored about him and to have access to his personnel file.
- We take care of intellectual property by using only legal software and do not use third-party material without the permission of the author or the owner.

6. Recording of financial data

In the Companies, we comply with the law relating to bookkeeping and make financial settlements in a clear and transparent manner.

- We do not hide the actual status of transactions.
- We do not create false accounting records and are audited annually by an external company.
- We store invoices and other financial documents securely and for the legally required period of time.

7. Taking care of property of the Companies

Care for machinery, devices, equipment, and intangible assets such as the brand, image of

the Companies or working time, is an expression of the integrity of the Companies' employees.

- We look after tangible assets of the Companies with the utmost care, protecting them from damage, destruction, theft, and waste.
- We do not use the company property for personal gain.
- We protect the intellectual property of our Companies.
- Through our behaviour in and outside the workplace, we maintain the good image of the Companies.
- We do not speak negatively about the company in private conversations or in comments on social media. We report noticed irregularities or problems to our supervisor or Ethics Officer or use the breach notification systems provided by the Company.
- We deny false information about the Companies.
- We do not arrive late for work and we leave the workplace according to the designated rules.
- We use our working time, when working remotely as well, to complete our business tasks only.
- We exercise our right to take a break during the period of time specified by the employer.

8. Conflict of interest and competitive activities

A conflict of interest occurs when an employee acting for his own benefit or the benefit of another person or entity to which he owes obligations, simultaneously acts against the interests of the company and when, through this action, he is unable to perform his work for the company objectively and effectively. To avoid the suspicion of conflicts of interest or competitive activities:

- We make business decisions guided exclusively by the interests of the company.
- We do not favour immediate family members or relatives at work.
- We do not employ family members in an arrangement of direct service subordination or otherwise likely to adversely affect the objective assessment of their work.
- We do not perform any type of work or provide consultancy services to our business partners and competitors.
- We inform our superiors of actions or failure to respond to actions that constitute or could constitute a conflict of interest or a symptom of competitive activity.

9. Offering and accepting undue advantage

In order to prevent corruption occurrence, we are guided by the following principles:

- Under no circumstances do we give, promise, accept, demand or accept the promise of a bribe.
- We do not give, request or accept financial or personal benefits if:
  - they do not fall within the normal business practice,
  - their value is exaggerated,

- they cause a conflict of interest,
- they violate applicable laws or regulations.

- We do not give, promise or offer undue advantage to persons holding public office.
- We firmly and immediately refuse all illegal proposals.
- If a gift, offer to receive a gift or other personal benefit is questionable, it is required to consult the supervisor or Ethics Officer before taking any action.
- We report reasonable suspicions of corrupt behaviour in accordance with the "Procedure for internal notifying and follow-up at Farm Frites Poland SA and Farm Frites Poland Dwa Sp. z o.o."

Rules of conduct for ensuring business fairness and preventing, detecting and dealing with corruption at all levels of the organisation are set out in the internal "Procedure for ensuring business fairness and anti-corruption" (P 15.0)

10. Behaviour outside the place and time of work

Companies do not interfere in the private lives of the employees. However, our behaviour outside the company must not adversely affect the quality of our professional duties or the image of the Companies.

- We should remember that, even after work, we are the representatives of our company and should maintain a positive image of the company and avoid situations that could jeopardise its reputation;
- When speaking on the company-related topics outside the working hours, we present information in line with the company's position or make it clear that it is our personal opinion.

11. Political commitment

The company does not engage in any way in political activities, nor does it encourage employees to do so.
In contrast, every employee has the right to political engagement outside the workplace and working hours.

The Company and external environment

1. Customers

We put a high value on good relations and cooperation satisfaction, providing our customers with a professional and reliable service. Our relationships with the customers are characterised by:

- Ensuring that the products we manufacture meet the highest quality standards and are safe for customers.
- Providing a professional and efficient service and being open to customers' expectations and comments.
- Providing full and truthful information about our products, with the exception of information that constitutes company secrets or is protected by law.
- Accepting responsibility for the products on offer and withdrawing products suspected of not meeting quality requirements from the market.
- Handling complaints in a timely manner and keeping customers informed about the progress of the complaint handling process.
- Taking care to protect the information we receive during the establishment and implementation of the cooperation.
- Fulfilling orders in accordance with the terms of the contracts concluded.

2. Business partners

It is important for us to build and keep the image of a reliable and credible partner. Our business relationships are based on respect, trust, long-term cooperation and professionalism. Our cooperation with the business partners, including the subcontractors and all suppliers, is based on the following principles:

- We select the supplier in accordance with internal requirements and procedures.
- We inform our business partners of our requirements and standards of conduct.
- When selecting a supplier, we identify situations that could lead to conflicts of interest.
- We assess business partners fairly, based on clear and objective criteria.
- We meet payment deadlines and other contractual obligations.
- We resolve conflict and dispute situations through dialogue.

3. Local community

Our Companies have been strongly connected to the local environment since the beginning. Feeling responsible for the actions implemented, we make efforts to ensure that any negative effects are reduced and positive effects are increased. We regard acting for the local community as our duty and privilege.

We apply the following principles in our relationship with the local community:

- We openly and honestly inform on activities of the Companies affecting the community.
- We are open and sensitive to the needs of our environment.
- We initiate and engage in actions that serve the local community in line with sustainable development goals.

4. Environment

We feel obliged to continuously improve our production processes and all activities we carry out in order to reduce and prevent negative environmental impacts. We want to meet customers' expectations by producing products in an environmentally friendly manner, as well as the employees' and members' of the local community, providing them with a safe place to live.

Our care for the environment is expressed as follows:

- We comply with current environmental legislation and standards and are constantly updating them.
- We respond to and report information on environmental infringements through the notification systems provided by the company.
- We apply rational and regulated waste management.
- We are economical with the utilities we use, such as water, electricity, gas, etc.
- We reduce the potential for failures and leaks of environmentally harmful agents.
- We provide training and promote environmental awareness among the employees.
- We support and engage with the local environmental initiatives.

5. Competition

We believe that all participants in the common market have equal opportunities and can only compete for customers based on the quality of products offered at a fair price.
In our relationship with our competitors:

- Both externally and internally, we speak respectfully about them.

- In our interactions with each other, we present a cooperative attitude in areas where this is possible.
- We do not use practices such as industrial espionage, identity theft or concealment in order to obtain confidential information.
- When collecting information about them, we only use methods permitted by law to compare product quality.

Principles of ethics programme management

1. General provisions

The Code of Ethical Conduct has been developed for the benefit of all employees of the Companies and applies to all of them, regardless of their position. It is the responsibility of every employee to be familiar with the contents of the Code and to abide by its principles.

In case of doubt about the provisions of the Code, any employee may seek clarification from his immediate superior or the Ethics Officer.

Managers and executives are required to:

- inform the subordinate staff and new recruits of the applicable ethical standards;
- promote and explain the content of the Code;
- prevent violations of the Code;
- respond carefully and firmly to behaviour that violates the Code;
- support and cooperate with the Ethics Officers and the Ethics Programme Coordinator.

Any employee of the Companies may also submit comments and proposals for amendments to the content of the Code. Such comments should be addressed to any Ethics Officer, who will discuss and analyse their validity in terms of the development of the ethical organisational culture of the Companies at the next meeting of the team of Ethics Officers.

Any person who, on reasonable grounds, suspects a violation of the Code, has witnessed or has himself experienced behaviour contrary to the principles of the Code, is required to take independent action or to notify it to his supervisor or the Ethics Officer.

The supervisor is obliged to take action to clarify the situation and resolve it or refer the matter to the Ethics Officer.

The Employer will not tolerate any form of pressure, repression or deprecation of the Ethics Officer or Ethics Programme Coordinator.

In order to effectively manage the ethics programme, the Employer establishes: Ethics Officers, an Ethics Programme Coordinator and an Ethics Council.

2. Ethics Officer

The team of Ethics Officers consists of 5–7 people from different areas of the Companies. The Ethics Officer is an employee of the Companies selected by the Ethics Programme Coordinator. The Ethics Officer serves free of charge and for an indefinite period. He may resign at any time by informing the Ethics Programme Coordinator and providing him with all the information acquired to date in connection with the function.

The Ethics Officer is a person who:

a. has a good reputation;
b. is required to keep confidentiality of any information obtained in connection with the performance of his function and not to disclose it to any unauthorised persons;
c. is an impartial person who undertakes to exclude himself from a matter in respect of which he may have a conflict of interest;
d. is subject to the Employer's protection against retaliation in connection with the performance of his function.

The duties of the Ethics Officer include:

a. clarifying doubts about the provisions of the Code;
b. supporting managers and executives in promoting and explaining the provisions of the Code;
c. receiving and investigating reports of potential violations of the Code;
d. signalling observed Code violations;
e. taking certain decisions in relation to the notification, including requesting the Ethics Programme Coordinator to set up a fact-finding committee;
f. receiving comments and proposals for amendments to the Code from the employees and other stakeholders of the Companies;
g. educating on the attitudes and norms associated with the Code;
h. propagation of the provisions of the Code;
i. keeping anonymous statistics on the activities of the Ethics Officers;
j. cooperation with the Ethics Programme Coordinator;
k. active participation in meetings of the Ethics Officers' team.

The Ethics Officers' team is made up of all Ethics Officers. The team meets quarterly to discuss situations of violations of the Code or good practices related to compliance with the Code and to discuss proposals for changes to the Code and the ethics programme.

Meetings of the Ethics Officers' team are convened and attended by the Ethics Programme Coordinator.

3. Ethics Programme Coordinator

The Ethics Programme Coordinator is the manager of communications and community engagement.

The task of the Ethics Programme Coordinator is to:

a. develop a programme of events to build an ethical culture in the Companies;
b. develop a training schedule for staff on Code issues;
c. appoint Ethics Officers;
d. participate in meetings of the Ethics Officers' team and the Ethics Council;
e. coordinate the receipt and handling of reports of violations of the Code;
f. appoint fact-finding committees at the request of Ethics Officers;
g. make amendments to the Code approved by the Ethics Council;
h. supervise the work of the Ethics Officers;
i. supervise the work of the fact-finding committees;
j. monitor and improve the ethics programme;

k. organise meetings of the Ethics Council;
l. report to the President of the Management Board.

4. Ethics Council

The Ethics Council is composed of: the President of the Management Board, the HR, Communications and Community Engagement Director and the Ethics Programme Coordinator. The purpose of establishing the Ethics Council is to set the direction of the ethical maturity of the Companies, to monitor, and improve the ethics programme.

Meetings of the Ethics Council are held at least once a year. The Ethics Council meetings are convened by the President of the Management Board and organised by the Ethics Programme Coordinator. The decisions of the Ethics Council are binding to all employees of the Companies.

In addition to the above tasks, the Ethics Council also acts as the highest and final internal appeal instance in the event of an appeal of an employee to a decision relating to the consideration of a notification of a breach of the Code. In this role, the Council debates in a composition appointed by the President of the Management Board, excluding those involved in the consideration of the notification.

5. Notifying violations of the Code

All employees of the Companies and its other stakeholders (including customers, subcontractors, business partners, representatives of the local community) have the opportunity to notify violations of the Code.

1. A notification of a breach of the Code should include:
    - the description of situation with an indication of the facts relevant to the case – what happened, when, where, what exact behaviour is the reason for the notification, who the notification concerns, who is the offender;
    - name of the notifying person;
    - the notification may include documentary or photographic evidence.

2. The identity of the notifying person is subject to special protection. The above also applies to any personal data disclosed in the notification, including the personal data of the person to whom the notification relates. The notifying person's personal data and other identifiable information are not subject to disclosing, unless the notifying person gives an express consent.

3. Notifications on violations can be made anonymously. They will be considered provided they contain an accurate description of the breach.

4. In the case of an anonymous notification, the conclusions of the investigation will not be communicated to the notifying person. An anonymous notification may remain unprocessed.

5. A notification of a breach of the Code can be made:
    - during a face-to-face, pre-arranged meeting with the Ethics Officer;
    - by submitting a notification via the FFP SpeakUp platform, https://cosun.speakup.report/pl/ffp/home;
    - by sending an e-mail to: sygnalista@ffp.pl.

6. In the case of a notification concerning the Ethics Officer, notification of a breach of the Code should be addressed to the Ethics Programme Coordinator.

7. In the case of a notification concerning the Ethics Programme Coordinator, the notification of a breach of the Code should be addressed to the President of the Management Board.

8. In the case of a notification concerning the President of the Management Board, the notification of a breach of the Code should be addressed to the Supervisory Board.

9. Upon receipt of a notification, the Ethics Officer, without undue delay, conducts an initial review of the notification to determine whether the information contained therein permits intervention or investigation and, if necessary, contact the person making the notification and ask him to supplement the notification.

10. The Ethics Officer decides on the next course of action, including, but not limited to, taking educational measures, referring the problem to the relevant supervisor or organisational unit, referring the affected persons to crisis intervention, resolving the conflict, mediation, immediately notifying the Ethics Programme Coordinator or the President of the Management Board, referring the notification to person accepting the notification in accordance with the procedure and the Whistleblower Protection Act, or requesting the Ethics Programme Coordinator to set up a fact-finding committee.

11. The notification may remain unprocessed when:
    - it does not relate to a breach of the Code of Ethical Conduct;
    - has already been dealt with and the notifying person has not provided additional information;
    - the extent of the information in the notification makes it impossible to take actions.

12. The Ethics Officer is obliged to inform the notifying person and the person concerned of the initiation of the investigation.

13. In order to establish the facts of the case covered by a given notification, the Ethics Programme Coordinator appoints a fact-finding committee.

14. Each member of the committee is bound to confidentiality and must hold the relevant authorisation from the President of the Management Board constituting *Appendix 1* and the relevant authorisation to process personal data.

15. Each member of the committee signs a declaration of impartiality, a template of which is attached as *Appendix 2*, before proceeding with the consideration of the notification.

16. The following persons may not serve as members of the committee:
    - notifying person;
    - person concerned;
    - person experiencing a breach;
    - person who is the direct subordinate or superior of the notifying person or of the person experiencing a breach;
    - person related to the notifying person or to the person concerned or to the person experiencing a breach, by marriage, by blood or affinity in a direct line or by any other relationship which raises a reasonable doubt as to his/her objectivity and impartiality.

17. Members of the committee, depending on the nature of the case, may be:
    - employees of the Companies,
    - employees of the Companies and external experts,
    - external experts only, when the notification concerns a person in senior management,

    appointed on a case-by-case basis to deal with a specific notification.

18. Any employee attending the hearing is required to provide the fact-finding committee with truthful, comprehensive information and is bound by a duty of confidentiality. Any person who wishes to do so will be granted full anonymity. A template of the Hearing Participant Statement is attached as *Appendix 3*.

19. The Ethics Officer prepare a report of the investigation, which includes a description of the course of the investigation, description of the facts established, including the violations found, the persons responsible for them, other conclusions, and recommendations for corrective action.

20. The report, through the Ethics Programme Coordinator, is forwarded exclusively to the President of the Management Board.

21. The report on the investigation is a confidential document and its distribution, in whole or in parts, is prohibited.

22. The notifying person and the person concerned have the right to be informed of the progress of the proceedings. However, due to the need for confidentiality, certain aspects of the proceedings or actions taken may not be disclosed.

23. All investigation activities should be completed within 3 months of receipt of the notification, unless this proves impossible for legitimate reasons.

24. The Ethics Officer, upon completion of the investigation, communicate the conclusions of the investigation in writing to the notifying person and the person concerned, taking into account the protection of personal data.

25. The Ethics Officer maintains and updates the documentation of the representatives.

26. The notifying person or the person concerned has the right, within 7 calendar days of receiving the conclusions arising from the notification, to appeal against them, in writing, to the Ethics Council.

27. The Ethics Council review, within 14 calendar days, the appeal and issue a final decision on the outcome of the case.

28. If a breach is confirmed, the President of the Management Board decides on appropriate measures, in particular: calling for the cessation of breaches, applying appropriate sanctions to the offenders, changes in positions, changes in procedures, introducing remedial measures to avoid future breaches, support for those affected.

29. If, during the course of the investigation, it is proved that a notification was made in bad faith, i.e. the notifying person knew or, in the exercise of due diligence, could have known that the notification was ungrounded or untrue, the notifying person will be prosecuted.

6. Glossary

Ethics in the Companies – a set of principles and standards of conduct established in the Companies that are integral to the manner the Company conducts its business. They define the standards of work within the Company and the relationship with internal and external stakeholders.

Discrimination – unequal treatment of individuals or social groups, in particular on the grounds of sex, age, disability, race, religion, nationality, political opinion, trade union membership, ethnic origin, religion, sexual orientation, or on the basis of employment of limited or indefinite duration or full or part-time employment. In the work environment, discrimination can occur in a number of areas, i.e. in the establishment and termination of the employment relationship, terms and conditions of employment, promotion opportunities, and access to training to improve professional qualifications;

Dignity – a non-material personal good of a human being that is closely related to the person, involving his physical and psychological integrity.

Conflict of interest – occurs when, for example, an employee is obliged, as a result of external circumstances or his own actions, to have dual loyalty. It is a conflict between private and public interests. Conflicts of interest can be **actual**, when an employee pursues his private interest at the expense of the interest of the Companies, **potential**, when an actual conflict of interest is likely,

or **perceived**, when in the eyes of others an employee pursues his private interest at the expense of the interest of the Companies.

Corruption – the abuse of one's position to gain undue advantage.

Assets of the Companies – financial assets and liabilities including debts and loans**.** Business assets include both tangible assets (e.g. buildings, machinery, securities, cash) and intangible assets (e.g. patents, marks, brands, rights, licences) that are used in the business.

Property of the Companies – the total rights relating to tangible, intangible or legal assets.

Bullying – actions or behaviours concerning an employee or directed against an employee, consisting of persistent and prolonged harassment or intimidation of an employee, causing an employee's appraisal of his professional usefulness to be lowered, causing or aimed at humiliating or ridiculing an employee, isolating him or eliminating him from his team of co-workers.

Harassment – a manifestation of discrimination, any unwanted behaviour which has the purpose or effect of violating the dignity of an employee and creating an intimidating, hostile, degrading, humiliating or offensive environment towards him; this behaviour may consist of physical, verbal and non-verbal elements.

Sexual harassment – a manifestation of discrimination, any unwanted conduct of a sexual nature or relating to the sex of an employee which has the purpose or effect of violating the employee's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment towards the employee.

Undue advantage – anything over and above what is received from the employer by virtue of the employment relationship (salary, bonus, etc.);

Company values – the patterns of attitudes, behaviours, conduct and actions valued by the organisation.

7. Final provisions

The Code is available at www.ffp.pl under the "Responsibility" tab, on the Intranet and at each Ethics Officer.

The Code is available in Polish, English and Ukrainian versions.

The Code has been prepared based on the expectations of the employees and the requirements of the customers of Farm Frites Poland SA and Farm Frites Poland Dwa Sp. z o.o.

Any breach of the Code will be treated as a breach of the employee duties, which may result in the penalties under the Labour Regulations and other legislation.

The Code enters into force on 1 September 2020.

Version 5 (updated on 1 May 2025)