

Business Partners Code of Conduct

Atlas Agro Holding AG

2024

Introduction

Atlas Agro Holding AG and its subsidiaries (hereinafter referred to as “Atlas Agro”) are committed to being part of a responsible and sustainable value chain. We expect our Business Partners to comply with all relevant laws and regulations, as well as our Business Partner code of conduct. This means they have to conduct their business in line with internationally recognized and endorsed standards in key areas such as anti-corruption, human rights, labor conditions, sustainability, business ethics, and compliance.

Atlas Agro will only work with partners that fulfil these requirements, and failure to do so may result in discontinuation of the business relationship.

1. Legal compliance

Business Partners must comply with all applicable local, national, and international laws and regulations. This includes, but is not limited to, laws related to labor, environmental protection, health and safety, anti-bribery, and anti-corruption.

2. Ethical Business Practices

Business Partners are expected to uphold the highest standards of ethical behavior. This includes avoiding any form of bribery, corruption, or unethical practices in their dealings with our organization.

3. Anti-Bribery

a. Business Partners must not offer, promise, give, or accept bribes or kickbacks, whether directly or indirectly, to or from any individual or entity, including government officials, to gain or retain business advantages.

b. Business Partners must have robust anti-bribery policies and procedures in place to prevent and detect bribery within their organization.

4. Compliance with sanctions

a. Business Partners is committed to conducting business with integrity and in compliance with trade restrictions and sanctions laws and regulations applicable to the jurisdictions in which the Business partner or Atlas Agro operates or conduct business. This includes, but is not limited to, sanctions imposed by the United Nations, the United States government (including the Office of Foreign Assets Control - OFAC), the European Union, United Kingdom, Australia, Switzerland and any other relevant authorities.

5. Conflict of Interest

a. Business Partners must promptly disclose any actual or potential conflicts of interest that may arise in their relationship with Atlas Agro.

b. Business Partners shall take appropriate steps to mitigate or eliminate conflicts of interest that may compromise their ability to act in the best interest of Atlas Agro.

6. Labor Practices

a. Business Partners shall uphold the fundamental labor rights of their employees, including the right to fair wages, reasonable working hours, and a safe and healthy work environment.

b. Child labor and forced labor are strictly prohibited. Business Partners must not employ individuals below the legal working age or under any form of coercion.

7. Environmental Responsibility

Business Partners are encouraged to adopt environmentally responsible practices. This includes minimizing the environmental impact of their operations, reducing waste, and complying with relevant environmental laws and regulations

8. Quality and Safety

a. Business Partners must deliver products and services that meet agreed-upon quality standards.

b. Safety is a top priority. Business Partners must ensure the safety of their products, services, and working conditions

9. Fair Competition

Business Partners must compete fairly and honestly in the marketplace. Any form of anti-competitive behavior, including price-fixing, bid rigging, or collusion, is strictly prohibited

10. Confidentiality and Intellectual Property

Business Partners must respect and protect the confidentiality of Atlas Agro's information and intellectual property. Any use or disclosure of proprietary information without proper authorization is strictly prohibited.

11. Social Responsibility

Business Partners are encouraged to actively contribute to the well-being of the communities in which they operate. This includes supporting local initiatives, respecting human rights, and promoting diversity and inclusion

12. Reporting and Accountability

Business Partners are encouraged to promptly report any concerns or violations of this code of conduct to Atlas Agro, and Atlas Agro reserves the right to assess Business Partners compliance and take appropriate actions if violations are identified.

Conclusion and Acknowledgement

By partnering with Atlas Agro companies, Business Partners agree to adhere to the principles outlined in this Business Partners Code of Conduct. Failure to comply may result in the termination of the business relationship.