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1. Message from the founders

Dear colleagues. We've spent most of our working lives in the fertiliser and farming industry, and it's almost a family tradition. Petter spent summers growing up watching ships laden with fertiliser leave for exotic places with his grandfather, the site manager of a urea plant in Norway. Knut grew up at Jæren, one of the most productive agricultural regions in Norway, where the application of manure every year marked the coming of spring.

We are now embarking on a journey to change the industry. What once saved millions of people from starvation is threatening the existence of the very people it saves. Climate change is a threat and needs to be tackled head-on.

We believe most of us are excited to take on this challenge. To remove emissions from fertiliser production, feed the growing population and safeguard the planet.

We also have high ambitions for the future, with plans to grow to become an industry giant purely on renewable sources. We aspire to have the best safety performance, highest profitable growth, lowest production cost per unit, and highest premiums in the fertiliser industry enabled by the best technology, the most qualified and motivated workforce driving continuous improvement, supported by a state-of-the-art institution and the ability to carry out growth projects faster and better than anyone else.

Just as we set the highest environmental standards, we aim to be industry-leading regarding occupational and product safety and governance.

Our goal is that no one will come home to their family injured from working at Atlas Agro. In every interaction with our customers, suppliers, governments and other stakeholders, we improve and enforce fairness and equality and uphold the highest principle of good conduct.

Becoming the market leader is not about getting bigger but becoming the most professional and profitable company in our industry. We look forward to continuing working with you to ensure that Atlas Agro improves the quality of life of the growing population by helping grow healthy, affordable food in harmony with the environment and, at the same time, making Atlas Agro the most profitable, value-creating, customer-centric, and attractive fertiliser company in the world, applying 'the highest ethical standards.

This will ensure future investments, secure our jobs, make the working day safer and more rewarding for everyone at Atlas Agro, and give more farmers access to our sustainable products, enabling them to grow the food the world needs.



Petter Østbø



Knut Karlsen

2. How we do business

Atlas Agro and any and each of its subsidiaries (together, “**Atlas Agro**”) do business fairly. We uphold the highest principles of ethics, compliance and governance. Atlas Agro’s future depends on promoting our reputation and retaining public trust.

Our code of conduct (the “**CoC**”) is updated annually. This CoC is valid from 09.11.2023 until the new version arrives. Every employee is responsible for familiarising themselves with the CoC in its latest version.

The CoC applies to all of Atlas Agro’s employees, whether full-time, part-time, permanent, or temporary, as well as the members of the Board of Directors.

Atlas Agro requires everyone to follow the letter and spirit of the CoC, our policies and procedures, and, of course, laws and regulations. Any violations will result in disciplinary actions, up to and including termination of employment and potentially civil or criminal proceedings.

All disciplinary actions will be reasonable and proportionate and follow sound principles for investigating reasons for breaches. If the violation includes infringement of local laws or regulations, or if Atlas Agro has a claim for damages, any such violations may additionally subject individuals to civil and criminal prosecution.

Refusing to follow instructions from a line manager or supervisor that would violate the CoC, Atlas Agro’s policies and procedures, laws and regulations will not lead to retribution, retaliation, or discipline.

When local laws and regulations differ from Atlas Agro’s CoC policies and procedures, we follow whichever applies the strictest standard.

All employees must comply with Atlas Agro’s policies, local laws and regulations. We need to read and abide by the CoC and integrate the principles it sets forth in our professional conduct and in the way we conduct business. You have the right and responsibility to seek guidance from your manager or another senior employee if you are in doubt about a business decision. We must report what we, in good faith, consider to be violations of the CoC, laws and regulations and material breaches of Atlas Agro’s policies and procedures. We cooperate fully with any internal investigation.

If you are a manager, you have additional responsibilities that go beyond the basic requirements. Managers need to role model good behaviour and lead by example. Managers need to understand dilemmas that can surface and be able to provide support and guidance to employees. Everyone in Atlas Agro should be encouraged to raise questions and concerns to create a culture of openness and trust, and employees who report concerns or violations in good faith shall be met with the highest degree of integrity and professionalism. Managers also have the right and responsibility to seek and receive guidance for conduct and how to deal with any report they receive or behaviour they observe.

At Atlas Agro, we believe that a diverse and inclusive work environment where employees are valued for their uniqueness and are obliged to speak up benefits our business. Everyone is expected, at all times, to display respectful behaviour towards their colleagues and their ideas, as well as to our business partners. We encourage our employees to challenge inappropriate language, assumptions and behaviours openly.

2.1. Equal opportunity

At Atlas Agro, we are committed to creating an equal opportunity workplace where hiring and development are based on competence (knowledge, skill, attitude), experience, achievements and potential of each individual. We do not allow discrimination where an individual or a group of individuals are considered less or more eligible based on their national origin, union membership, ethnicity, race, religion, age, gender (including pregnancy), sexual orientation, identity, marital status, veteran status, medical status, physical ability, etc.

2.2. Personal conduct

When representing Atlas Agro, whether during working hours, during a business trip, or in any other setting where you are seen as a representative of Atlas Agro (including when wearing any Atlas Agro's gear or displaying the Atlas Agro logo privately), you are expected to act professionally and responsibly. You shall not visit any establishment or partake in any activity that would reflect negatively on Atlas Agro. All your actions must always follow local laws and regulations.

2.3. Harassment

Atlas Agro does not tolerate harassment. With harassment, we mean any form of unwanted behaviour toward another person that:

- Creates a hostile, intimidating, humiliating, degrading, or offensive work environment.
- Unreasonably interferes with or disrupts another's work performance or employment opportunities. Harassment may be a gesture, or it may be verbal, physical, visual, written, or sexual. It can be a single act or a repeated action.
- Sexual harassment includes unwelcome sexual advances, requests for sexual favours, and any other verbal, physical, written or visual harassment of a sexual nature.

Arguing the facts of a case, disagreeing with others' points of view respectfully, even if forceful, and voicing differing opinions is a valued part of an open and curious business culture that thrives on proactive and open feedback and is not harassment.

2.4. Violence

Atlas Agro does not tolerate any form of psychological violence.

2.5. Drugs and alcohol

You shall not be under the influence of intoxicating substances, including alcohol, during working hours, while on Atlas Agro's premises, while conducting business on Atlas Agro's behalf, or at any social events sponsored by Atlas Agro outside regular working hours.

However, reasonable and eligible amounts of alcohol may be consumed when local customs and the occasion make it appropriate. The strictest interpretation shall be the basis for evaluating what is reasonable and proper. This exception will never allow you to drive, operate machinery, compromise industrial safety requirements, or conduct business on Atlas Agro's behalf while under the influence. This applies even to intoxicating substances prescribed by a doctor. While drinking, you must not encourage others to drink, behave in a manner that places you or Atlas Agro in an unfavourable light, place anyone in jeopardy, or cause discomfort or offence.

3. Safety and Security

In Atlas Agro, we believe that all injuries are preventable. Nobody must ever act in a way that puts themselves, their colleagues, business partners or anyone else at risk to their health, safety or security.

4. Anti-corruption

Atlas Agro has zero tolerance for any form of Bribery or Corruption and has developed and maintains an Anti-Bribery & Corruption Policy.

Transparency International defines corruption as “the abuse of entrusted power for private gain.” Under Atlas Agro’s Anti-Bribery & Corruption Policy, corruption is defined as the misuse of public office or power for private gain or misuse of private power in relation to business outside the realm of government. Generally, an advantage is considered improper if it can influence, or be perceived to influence, the receiver’s ability to make objective business decisions. There is no requirement that the improper advantage makes the recipient act in a certain way; simply that it could be perceived to influence the recipient is enough. It is also worth noting that giving an improper advantage is treated like receiving it. Examples of improper advantages include cash, valuable or frequent gifts, extensive and lavish travel, or hospitality such as sporting or cultural events. Recipients of such improper advantages can be oneself or one’s friends or family. Other indirect examples include a low-interest loan, promise of future employment, “pulling strings” or “favours,” etc.

Bribery and facilitation payments are types of corruption, while conflicts of interest, gifts, hospitality, and expenses may constitute or lead to corruption, depending on the circumstances.

Bribery means any direct or indirect benefit given, offered, promised, accepted, requested, or authorised with the intent that any person is improperly influenced to act or decide to obtain or retain a personal or business benefit or advantage.

Facilitation payment or “grease payment” occurs when a payment of any kind or nature is made to a public official for their personal benefit to encourage them to expedite a routine or common government task that such public official is otherwise required to undertake, e.g. processing papers and issuing permits. The payment is of a nominal value relative to the local economy. You shall never make facilitation payments on behalf of, or in acting for, Atlas Agro. This applies regardless of whether the payment is made directly or indirectly through a third party, including Business Partners, and whether the payment is in cash or kind. If you encounter requests for facilitation payments, you must challenge them vigorously.

Trading in influence is also a type of corruption. Trading in influence occurs when an improper advantage is offered or requested to make someone influence a third party’s actions.

Atlas Agro is willing to face the extra time, cost, and effort to avoid any manifestation or form of bribery or corruption. However, as for all policies in the CoC, complying with Atlas Agro’s Anti-Bribery & Corruption Policy shall never endanger anybody’s health, safety or security.

As a company or group generally, Atlas Agro can be prosecuted for law violations, even if no individual is punished. Other consequences for Atlas Agro may include civil liability, loss of business, and a damaged reputation. Individuals involved in acts of corruption may be exposed to civil and criminal liability.

If you doubt the propriety of a particular situation or proposed act, refer to the Anti-Bribery & Corruption Policy and consult with the General Counsel as soon as possible.

5. Hospitality, receiving gifts, charging expenses

At Atlas Agro, we prefer not to give or receive gifts, and we have implemented a Gifts & Entertainment Policy for these purposes.

Hospitality, gifts, and expenses that could affect or be perceived to affect the outcome of business transactions are prohibited, as they can be used as a cover for bribery. You must always base your business decisions on objectivity and loyalty to Atlas Agro, not personal loyalty or preferences. Always use prudent judgment and consider Atlas Agro's reputation for integrity as the ultimate guideline.

There should be openness and transparency about hospitality, expenses, and gifts, reflecting Atlas Agro's values, the business purpose, and the occasion.

All gifts and hospitality shall be recorded accurately in Atlas Agro's books and records. Atlas Agro prohibits giving and receiving hospitality, gifts, and expenses that:

- Create, or appear to create, improper influence between parties.
- Are excessive or frequent.
- Are given to parties involved in a contract negotiation, a tender or a competitive bidding process.
- Are "quid pro quo" (offered for something in return)
- Are paid for personally to avoid reporting.
- Are not in accordance with local law, regulations, culture, or custom.
- Are considered inappropriate.
- Are monetary in nature, such as cash, loans, gift cards, vouchers, pre-paid credit cards, etc.

You have the right and responsibility to obtain guidance on these issues, and your first point of contact should always be your line manager.

At Atlas Agro, we distinguish between the following forms of hospitality:

- Business meals, receptions and hospitality
- Non-business hospitality

5.1. Business meals, receptions and hospitality

Meals and receptions with a Business Partner or other external party that creates or strengthens a business relationship will usually be considered business-relevant and acceptable. Note that the most senior person present should pay for the occasion. All business hospitality must be business-relevant. Business-relevant activities include, for instance:

- attending a trade fair
- conferences
- training sessions
- a plant inspection

5.2. Non-business hospitality

Hospitality that may not be considered relevant to your business includes sporting events, concerts or other cultural events. Discussing business on such occasions is not enough to make it a business-relevant activity. In case invited by a Business Partner, the employee in question must approve the hospitality with his line manager, and this shall be only allowed if the reasons for going are strong and the chance of the event being seen as non-compliant is nonexistent.

5.3. Gifts

Atlas Agro prefers to refrain from giving or receiving gifts. You should make this policy known to your business partners in advance to avoid being put in the awkward situation of not being able to accept

a gift or not having brought a gift where one is expected to. Atlas Agro encourages everyone to send regular reminders of the gift policy to relevant Business Partners, especially in advance of local holiday seasons. However, Atlas Agro understands that in some cultures, and on some special occasions, gift-giving is a natural and legitimate part of the business culture.

In cases where circumstances warrant gift giving, the employee can decide him or herself for gifts up to a value of USD 25 without prior approval from your line manager. This includes accepting gifts, giving gifts and non-business hospitality.

Questions to ask yourself:

- Is the gift or hospitality permissible by law?
- Does the gift or hospitality you offer comply with the recipient's policies?
- May the gift or hospitality give the appearance of improper influence?

Gifts and non-business hospitality over USD 25 shall be subject to notifying Atlas Agro and approval from your line manager.

5.4. Business travel

Business travel must never create or appear to create improper influence or advantages. The strictest possible interpretations should be used and must never be excessive or frequent.

At Atlas Agro, we pay for our own travel and accommodation costs when on business for Atlas Agro. We recognise that there may be circumstances where paying for the travel of Business Partners or others is warranted due to business needs. In these cases, your line manager must be informed before offering to pay such expenses.

Occasionally, sharing transport, such as a taxi ride or transportation to a remote location, makes sense. In these cases, an even distribution of costs is advised, but sensible discretion applies.

Spouses may join Atlas Agro employees on business travel if all associated costs are covered privately and not by Atlas Agro or another external party, and it does not interfere with business duties. Your line manager must be informed in writing. Atlas Agro will not pay for spouses even in the extraordinary event that we cover travel and accommodation costs for a Business Partner or another external party.

5.5. Gifts to Public Officials

A Public Official refers to anyone employed by or acting on behalf of, whether on a full or part-time basis, a national, regional, or local government; a government-owned or controlled company or other entity; employees or agents of public international organisations (such as the United Nations, European Union, World Bank, and other international development organisations); political parties, candidates for public office; and anyone else acting in an official capacity for or on behalf of a government agency or entity, including persons holding a legislative, administrative, or judicial post, and members of the military and police.

You must exercise extra caution when giving or receiving gifts, hospitality, and expenses such as per diem to or from Public Officials or their close associates. You shall never offer or give Public Officials gifts or hospitality to obtain a license, permit, or other benefits. However, covering a Public Official's travel and other costs in certain situations may be legitimate.

We do not contribute to political campaigns.

5.6. Expenses

All business expenses must be transparent, approved, reasonable, and follow applicable policies. They shall be accurately recorded in our books and records.

6. Avoiding conflict of interest

Conflicts of interest arise when one's interests interfere or appear to interfere with Atlas Agro's interests. Openness and transparency are crucial in dealing with actual, potential, or perceived conflicts of interest.

We recognise that conflicts of interest may lead to corruption and, as such, are determined to mitigate all conflicts of interest in Atlas Agro's operations. You may be expected to excuse yourself from any decision-making process that relates to an actual or potential conflict of interest. There are many forms of conflicts of interest. Conflicts of interest can be related to family members (a "family member" includes your spouse, romantic partner, parents, children, siblings, cousins, nephews, nieces, aunts, uncles, grandparents, grandchildren, and in-laws) or close friends (a close friend includes all kinds of personal non-family relationships, such as neighbours, former colleagues, friends from university, school, etc).

The following are some situations in which actual, potential, or perceived conflicts of interest commonly arise:

- If you manage or recruit family members or close friends.
- If there is intended to be a segregation of duties between you and a family member or close friend. A segregation of duty exists when a task has been split between two or more people to increase control. For instance, where one person authorises a payment, and another makes the payment.
- If your family member or close friend works or performs services for a Business Partner or competitor.
- If your family member or close friend owns or has a financial interest, whether directly or indirectly, in any of Atlas Agro's Business Partners or competitors.
- If you serve on the board of directors of a for-profit company without Atlas Agro's written approval.
- If you hold outside employment in which the interests of that job interfere with your ability to perform your professional duties for Atlas Agro.

You have the right and responsibility to obtain guidance on conflicts of interest, and your first point of contact should always be your line manager. For more, see section 3, Seeking Guidance and Reporting an Issue. Questions to ask yourself:

- Do you have any family members or close friends who work at Atlas Agro?
- Do you, any family member or close friend have any interest in an Atlas Agro Business Partner or competitor?
- Are you, any family member or close friend employed by an Atlas Agro Business Partner or competitor?
- Have you, any family member or close friend undertaken any transactions with an Atlas Agro Business Partner or competitor in the last year?
- Do you hold any positions (e.g., board membership) outside Atlas Agro?

7. Relationships between employees

Atlas Agro understands that romantic relationships may develop between employees. However, we also recognise that such relationships may affect the work environment for others and may increase the risk of misperceptions, conflicts of interest, and even fraud. If you are in a romantic relationship with a colleague, please pay special attention to the rules on conflicts of interest. If you have concerns about a romantic relationship, we encourage you to seek advice from your line manager. For romantic relationships within a reporting line or between colleagues within the same team, the highest ranking person must report the relationship to their line manager, and amicable adjustments should be made. All reports regarding romantic relationships will be handled with discretion.

8. Preventing fraud

Fraud is any intentional act or omission to deprive another of property or circumvent procedure by deception or other unfair means. Fraud may include, but is not limited to:

- internal and external threats;
- any diversion of funds or assets;
- theft;
- any form of corruption, including facilitation payments;
- financial statement manipulation, and
- failures to report breaches of the law, regulations or Atlas Agro's policies or procedures.

Atlas Agro has zero tolerance for Fraud, and we proactively combat it in all its forms, acting to identify and mitigate Fraud risks in our activities. We acknowledge that Fraud is how other irregularities, including corruption, are perpetrated.

9. Business partner code of conduct

Atlas Agro is committed to being part of a responsible and sustainable value chain. We expect our Business Partners to comply with all relevant laws and regulations and our Business Partner code of conduct. This means they must conduct their business in line with internationally recognised and endorsed standards in critical areas such as anti-corruption, human rights, labour 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 the discontinuation of the business relationship.

9.1. Intermediaries Working on Atlas Agro's Behalf

Any Business Partner that operates on Atlas Agro's behalf is considered an agent or intermediary. However, they may have many other names, such as consultants, contractors, agents, resellers, brokers, etc. Anti-corruption law and Atlas Agro's Anti-Bribery and Corruption Policy apply to all companies and individuals who act on Atlas Agro's behalf, regardless of their nationality or where they do business. This means that Atlas Agro is likely to be held responsible for the actions of an Intermediary. It also means these entities constitute high-risk Business Partners and require extra caution.

Intermediaries must contractually agree in writing to comply with a standard equal to or higher than the code of conduct for Atlas Agro's Business Partners.

9.2. Joint Ventures

In a joint venture or partnership over which Atlas Agro has control and management, Atlas Agro's standards shall apply to the fullest extent possible. If Atlas Agro does not have control, agreed standards and audit rights should be negotiated and documented between the parties, preferably in the joint venture agreement.

9.3. Integrity Due Diligence

To protect Atlas Agro, we must know who we are doing business with.

Employees initiating new business relationships must undergo an "Integrity Due Diligence" (IDD) on the counterparty to uncover any history of sanctions, corruption, and conflicts of interest. This process also ensures the legitimacy and solvency of the counterparty.

The employee introducing the business partner (the "originator") is responsible for ensuring that the identity is verified by the Compliance Manager and registered by the relevant Atlas Agro company before entering into any transaction.

There's no need to verify internal business, governmental agencies, or internationally recognised partners such as law firms, banks, auditors, etc.

Further, certain businesses, like taxis, hotels, and restaurants, are exempt due to feasibility constraints. Non-binding agreements with no monetary value, including NDAs, are also exempt.

All contracts or other binding agreements shall be in English or a dual language where English is one of the languages. The contract approval follows the regular approval process. After approval, the Originator shall scan and submit the transaction document according to Atlas Agro regulations.

Non-disclosure agreements (NDAs) require approval from the Legal department and completion of this procedure.

The IDD procedure can be found on the intranet or by asking the Compliance function or your manager. It collects certain documents and for the compliance function to run verification checks.

For legal entities, we require a document confirming the domicile, a certificate of tax registration and the ownership structure, including ultimate beneficial owners.

For individuals, we require a copy of the passport, a utility bill with an address, and consent for personal data processing.

To ensure we are up to date, we re-check counterparties every three years.

Complex agreements such as MOUs, LOIs, M&A&D transactions, and similar ones need to be negotiated, including representatives from the finance and legal functions.

9.4. Offshore Jurisdictions

Transactions involving offshore jurisdictions may expose Atlas Agro to additional risk due to limited insight. Such risk may arise from increased public and regulatory scrutiny of Business Partners' corporate structures and non-compliance with rules on money laundering or tax evasion. There may be legal and valid reasons for the use of offshore jurisdictions by Business Partners. Nonetheless, extra caution shall be taken where a Business Partner has a legal entity, bank account or other activities in such a location.

10. Financial code of conduct

10.1. Financial Accountability and Transparency

Atlas Agro is responsible for communicating timely, thoroughly, and accurately with our shareholders, government regulators, auditors and the general public.

Atlas Agro's financial records shall be complete, fair, accurate, timely, and understandable. Our records shall be prepared following applicable laws, regulations, relevant accounting standards, and Atlas Agro's internal policies.

Adequate, effective, and efficient internal control procedures related to all financial reporting need to be implemented in accordance with central requirements, including proper segregation of duties and delegation of authority. Everyone is responsible for ensuring that the financial reports and submissions they file are complete, fair, accurate, timely, and understandable. The business is responsible for ensuring that all business records (invoices, bills, travel and entertainment expense reports, payrolls, service records, reports, etc.) are prepared promptly and accurately.

Financial Reporting reflects what happens in the business; our books and records shall wholly and accurately reflect all business transactions you have engaged in. We must refrain from creating or participating in the creation of documents that are misleading or incomplete. This is particularly important where management judgments and assumptions influence the reported figures and where key performance indicators are based on financial results. Atlas Agro requires that all financial accounting and reporting employees show the necessary professional objectivity and scepticism.

Atlas Agro's communication and cooperation with internal and external auditors shall be open, honest, and complete. Any issues or concerns raised during such audits shall be addressed and resolved. You should immediately report any case of suspected or actual financial or operational misrepresentation or impropriety. Any deliberate act influencing or adjusting the financial records to achieve a desired result will be treated as Fraud.

10.2. Insider Trading

Although Atlas Agro is not a publicly listed company, we do not allow buying or selling shares or other financial instruments in Atlas Agro or competing companies if you possess information that is not commonly known in the market and which is likely to have a significant effect on the price of those financial instruments or related financial instruments if and when made public. You also may not advise others to perform such activities.

Material, non-publicly disclosed information can be either positive or negative. Examples of information that could be classified as inside information are financial statements that still need to be published, information on mergers or acquisitions, or changes in executive management.

10.3. Money Laundering

Many criminal acts aim to generate a profit for the individual or group that carries out the act. Money laundering is the processing of these criminal proceeds to disguise their illegal origin. Money laundering is illegal in most countries. Atlas Agro does not allow money laundering and takes preventative action to avoid unwittingly participating in such acts.

11. Human rights

Atlas Agro is committed to respecting internationally recognised human rights throughout our operations and supply chain. We support the United Nations Global Compact, the United Nations

Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, and the core conventions of the International Labor Organization (ILO).

We continually work to support and enforce the above principles throughout our organisation and in our relations with our suppliers, contractors, other Business Partners and the communities affected by our operations.

We expect our people to be highly aware of relevant human rights risks in our operations and those of our Business Partners.

11.1. Forced labor

Atlas Agro will not use any form of forced labour in our operations per the definitions provided by the ILO. A work relationship should be freely chosen and free from threats.

11.2. Equal pay and working hours

Atlas Agro is committed to paying employees fairly for their work, regardless of personal beliefs or individual characteristics. Individual compensation for an employee, consultant or contractor only varies based on position, performance and competence. All compensation shall meet the requirements of the national minimum wage. Furthermore, Atlas Agro upholds international and national laws on hours of work and rest periods.

11.3. Human trafficking

Human trafficking is a breach of fundamental human rights that Atlas Agro condemns in any form.

11.4. Community engagement and grievance

Atlas Agro engages with local communities and stakeholders on human rights issues related to our business and across our value chain. Through our operations, we aim to contribute to the economic and human development of our employees and the communities in which we operate. We will assess actual and potential human rights impacts from our operations and engage with those potentially affected when providing appropriate remediation.

11.5. Indigenous peoples and use of resources

Our operations should not hinder indigenous peoples from exercising their traditional rights. Indigenous peoples have the right to be informed and, after that, asked for their consent in decisions that may affect them. Atlas Agro is cautious not to increase demand for resources crucial for local communities' livelihoods or the survival of indigenous peoples. We respect the rights and interests of lands and waters of communities and indigenous peoples who traditionally own or use land where our production facilities are to be located.

11.6. Child labor

Specific programs may exist for roles such as apprenticeships below the age of 15, including additional monitoring. In any scenario, employment shall never harm a child's education, development, or overall well-being.

11.7. Freedom of association and right to collective bargaining

Atlas Agro recognises and respects the right to freedom of association and the right to collective bargaining. When operating in countries where this right is limited through local legislation, we will seek to take mitigating action following local conditions. One example could be encouraging

independent gatherings where employees can elect members to a representative committee to discuss work and safety-related matters with management.

12. Confidentiality

12.1. Confidential Information

We must all work to prevent unauthorised internal and external persons from accessing Atlas Agro's confidential information. Generally, confidential and strictly confidential information is non-public information particularly sensitive to Atlas Agro, its employees, or its business partners. Its unauthorised disclosure could adversely impact Atlas Agro and its partners.

Examples are strategic information such as business plans, marketing and sales information, contracts, product development plans, information on mergers and acquisitions, and design and engineering specifications. The unauthorised disclosure of such information could harm Atlas Agro's business or reputation and impact Atlas Agro's value or that of its partners.

12.2. Intellectual Property

Atlas Agro's intellectual property (IP) consists of any business ideas or information that Atlas Agro owns, such as unique products or methodologies and proprietary information. This includes our trade secrets, know-how, patents, trademarks, and materials protected by copyright. Be advised that Atlas Agro retains exclusive ownership of any intellectual property conceived or developed during your employment when this activity is performed in connection with or relating to work done with Atlas Agro. You must also respect the IP rights of Atlas Agro and others. This means you must comply with all applicable laws that govern Atlas Agro's IP and those of our Business Partners. In addition, you must respect the rights associated with using free software or shareware.

13. Data privacy

Atlas Agro will implement the Atlas Agro Data Privacy Policy, which sets out the framework for processing personal data in Atlas Agro.

Personal data entails any information relating to an identifiable individual person that can be used on its own or with other information to contact, locate or otherwise identify a particular person. The name, telephone number, and email address of an employee or a customer are typical examples of personal data, as well as performance reviews, salary information, hours worked, user profiles, and electronic activity logs regarding a person's use of IT resources.

Information about a company is not by itself personal data. However, the contact information of a company representative (for example, a customer representative) constitutes personal data and must be handled accordingly.

When you process personal data about other persons, you must protect and limit unauthorised access and prevent accidental disclosure. In this context, "processing" means any operation on or use of personal data, for example, registration, collection, storage, alteration, erasure, disclosure, and otherwise making the personal data available.

Data may only be used for specified, explicit and legitimate purposes. As an Atlas Agro employee, you may only collect, use, or otherwise process personal data necessary to reach your purposes. The activities of Atlas Agro must objectively justify those purposes.

Do not collect more personal data than necessary, define a retention period and make sure the personal data is deleted after the retention period.

14. Competition

Atlas Agro has a strict policy of conducting business in full compliance with all applicable competition laws and regulations. Our employees are responsible for familiarising ourselves with relevant competition laws and regulations and conducting our daily business activities in full compliance with them.

14.1. Competition law

To ensure that you are complying with competition law, be sure to:

- Stay vigilant when competitors speak about internal or commercially sensitive issues (e.g., pricing strategy, rebates, intended plant closures/ expansions, etc.). If such a conversation arises, remove yourself from it immediately and report the matter to your line manager and the Legal Department.
- Never engage in any improper communications, whether written, electronic or oral. Any communication may end up in a court of law.

14.2. Prohibited practices

Atlas Agro avoids practices such as

- Vertical restraints: (Prescribing minimum or maximum prices at which a distributor can resell a purchased product. Limiting the geographic territory where a distributor may resell what it has purchased. Inducing a buyer to deal only in one seller's products. Making the availability of one product dependent upon the purchase of other products or services)
- Collusion (Agreeing to sell the same products or services at the same price and on similar conditions. Producing or selling only a certain (limited) amount of product in the market. Agreeing to stay out of one another's markets to reduce competition in the agreed-upon territories or towards specific categories of customers. Participating in a form of fraud by which the parties present fake bids at an auction.)

Note that the above does not exclude providing exclusivity to an offtaker for a particular product or market for new plants to be financed, as this brings new products into the market and stimulates more competition.

15. How to act if you are uncertain

It is your right and responsibility to obtain guidance regarding any business decision you are uncertain about. "I didn't know" is not considered a valid defence for making a decision that is not in accordance with the CoC.

Reporting should be done as soon as possible. Your first point of contact for guidance should always be your line manager. Depending on the nature of the issue, you can also contact the manager's manager or any other senior manager that is more appropriate.

Please note that you can report possible violations, meaning you do not need to have all the facts or be utterly sure of wrongdoings. If you have a reasonable concern that misconduct has taken place, this is sufficient to report the issue. The only conditions for reporting a problem are that you do so in good faith and are completely honest about what you know or suspect.

You can report an issue anonymously. However, we encourage anyone who makes a report to share their contact information. This will allow quicker and more accurate handling of the reported issues, and all reports are handled with complete confidentiality.

Atlas Agro will not tolerate retaliation against anyone who has reported an actual or suspected violation in good faith. The same applies to someone who refuses to follow instructions that violate the CoC, Atlas Agro's policies and procedures, or laws and regulations.

Reporting in "good faith" means providing all the information you have and believe to be accurate, even if you remain anonymous. You can report something you suspect and still be in good faith, even if your suspicion turns out to be unjustified. If anyone deliberately makes a false report (i.e., claiming something they know or believe to be untrue), that person will be subject to disciplinary action.