

# CODE OF CONDUCT

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

Version 3

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# Introduction

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A foundation to Farm Frites Poland SA, Farm Frites Poland Dwa Sp. z o.o. and Farm Frites Poland Dwa Usługi Sp. z o.o, hereinafter referred to as "Companies" business activities is the Integrated Management System which is based on the idea of sustainable development. In accordance with the System, we act in a responsible manner by caring about our employees, minimizing our environmental impact, as well as improving our management systems and responding to the needs of our environment.

The Code of Conduct applies to all employees, regardless of their position, working hours, time and place of work.

It defines standards of conduct that should guide employees both in the workplace and in external affairs.

The purpose of the Code is to help to make the right choices by identifying basic ethical standards and norms in our business activities and social relations.

The Code does not extend the scope of regulations but collects fundamental principles from various regulations and statutes.

Although the Code covers a wide range of policies and procedures, employees need to independently assess a given situation. When you have doubts about your behaviour or the behaviour of your co-workers, or if the Code does not provide sufficient guidance, you should consult your immediate superior or a member of the Ethics Commission for interpretation.

Each Companies' employee must be familiar with the Code of Conduct and follow the guidelines outlined in the document.

We also expect our business partners, in particular our subcontractors and suppliers, to respect similar principles and values to those contained in the Code.

## 1. Compliance with law

In each area of its business activity, Companies are subject to laws, directives and other national, European Union and international regulations. We comply both with industry requirements and local regulations, as well as decisions issued by national, regional and local institutions.

Our employees are also required to comply with the national and local laws. The principles gathered in the Code of Conduct of the Companies are applicable but are not above the law, which should be respected by every employee in the first place. In case of doubt, employees should contact their immediate superior.

## Vision and Values

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### OUR VISION

*WHAT WE DO, WE DO WELL. WHAT WE DO WELL, WE CAN  
PROBABLY DO BETTER - TOGETHER*

### OUR VALUES

**OPENNESS** - We are open to dialogue, new solutions, ideas and opinions, even if we do not agree with them. We sincerely express our point of view.

**RESPECT** – We respect each other. We treat our business and social partners with respect. We respect diversity.

**RESPONSIBILITY** – We take responsibility for our decisions, actions and declarations towards each other, business partners, the environment and the local community.

**PROFESSIONALISM** – We are constantly learning, looking for new opportunities and solutions, we use our knowledge and experience. We comply with applicable standards.

**COOPERATION** – Together we create a team in which we trust each other, we help each other in achieving goals.

# The Company and its Employees

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## 1. Friendly workplace

**With intention to create a friendly workplace where we enjoy working:**

- We build positive relations with our co-workers that are based on mutual respect, tolerance and high personal culture.
- Any form of mobbing, harassment and physical, sexual, mental or verbal abuse is not tolerated.
- We do not tolerate behaviour and statements that violate personal rights of others and that lead to conflicts and disturb good workplace atmosphere.
- We do not use our position in the company for personal gain.
- We do not disseminate private or false information, or information that violates the dignity and good name of our co-workers.

**Relations with a supervisor are important for creating and maintaining a friendly workplace. Therefore, in relations with subordinates, supervisors at all levels are required to:**

- Keep appropriate distance.
- Treat subordinates as partners and individuals, based on objective and fair criteria.
- Issue commands that are clear, unambiguous and consistent with duties and power of a subordinate.
- Show confidence in skills and experience of a subordinate.
- Listen to subordinates, help them in resolving problems or direct them to a competent person.
- Support subordinates in handling professional problems and unexpected events.
- Address problems and concerns in private.
- Praise employees for their achievements in public.
- Inform subordinates about changes in regulations relating to their position and explain the changes.
- Keep subordinates informed about current plans, objectives and changes that might affect their position in the company.

## 2. Communication

**Effective communication, which is essential for proper operation of the company, is manifested by:**

- Executives understand the importance of two-way communication with employees in achieving business objectives, as well as in building good relations and friendly atmosphere.
- Every employee, regardless of position, has access to current information about the company to the extent necessary for his or her work.
- Every employee, regardless of position, has the right to information that might affect his or her work in the company.
- Channels for sharing information in the company need to be accessible for all employees, regardless of position.
- Information about the company can be communicated to the public only by its spokesman.
- We maintain good communication with external companies that we cooperate with.

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

- Our employees and people applying for a job in the company are fairly evaluated, based only on their skills, professional competences and quality of work.
- No one is discriminated based on gender, age, nationality and beliefs.
- We do not employ minors and we do not accept forced labour.
- Every employee has the opportunity for professional development and improvement of his or her qualifications.
- We inform our employees about their responsibilities and expectations for a given post in a comprehensible way.
- We share our knowledge and professional experience with our employees.
- Decisions on promotion are taken with utmost care and based on substantive reasons.
- We treat each other with respect regardless of position and seniority.

## 4. Health and safety

**Health and safety of our employees and other persons present on the premises of the company is our priority. We constantly strive to improve the occupational safety level and care for health of our employees. We aim at complete elimination of accidents at work.**

- We remember that each of us is responsible for their own safety as well as safety of our co-workers.
- We act in accordance with the law and internal procedures, instructions and rules on health and safety for a given position.
- We use personal protective equipment required for a given position.
- During work we do not consume alcohol, take drugs and other intoxicants or work under their influence.
- We report all cases of health and safety violations, accidents, injuries and uncontrolled discharge of hazardous substances into the environment to appropriate people or entities.
- We aim at improving methods for identifying hazard, preventing accidents at work and occupational diseases.
- We know how to behave in emergency situations and we warn people in the hazardous area about the emergency.
- We improve qualifications of our employees on health and safety and encourage them to engage in activities that improve working conditions.

## 5. Protection of privacy, information and business secrecy

**As part of the business, our company collects and stores information about its employees, clients, suppliers and other business partners. The data is collected only to the extent necessary for the business operation and is strictly protected.**

- We comply with all the rules and requirements on protection of privacy of our employees and business partners.
- We care about the information security of the company, employees and business partners.
- Confidential information is disclosed only to eligible persons.
- In case an unauthorized person gains access to sensitive information, we notify our superior immediately.
- Employees have the right to know what information about them is stored and to access their personal folders.

## 6. Financial records

**We comply with the laws relating to keeping accounting records and we perform financial statements in a clear and transparent way.**

- We do not hide the actual status of transactions.
- We do not create false accounting records and we are audited by an external company every year.

- We store invoices and other financial documents in a safe way and for the period of time required by law.

## 7. Use of company time and property

Employees show their integrity by respecting company property, by using the company equipment for its intended purpose and by managing their work time efficiently.

- We care for the company property and protect it from damage and theft.
- We do not use company property for personal gain.
- We protect intellectual property of our company.

## 8. Conflict of interests and competitive activities

A conflict of interests occurs when an employee acts against the interests of Companies while acting for his or her personal benefit, or the benefit of other person or entity he or she is liable towards, or when the behaviour prevents him or her from working effectively and objectively for Companies. To avoid conflict of interests and competitive activities:

- Business decisions are made impartially, based solely on the interests of the company.
- We avoid situations at work where we could be accused of favouring immediate family members or relatives.
- We do not perform work or provide any consultancy services for our business partners or competitors.
- We inform our superiors about behaviour, or lack of reaction to behaviour, that constitute or could constitute a conflict of interest or competitive activities.

## 9. Offering and accepting material benefits

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

- We do not give bribes, kickbacks, payoffs or offer any other material benefits with intent, or even giving the slightest appearance of intent, to impel other people to change their view of a situation or attitude towards our Company.
- We do not offer or give money or accept any valuable objects, entertainment or other personal benefits if:
  - they exceed ordinary business practice limits;

- their value is far too high („Valuable objects” may include favours, gifts, lavish entertainment, payments for air travel and hotel expenses as well as other objects)
- they could be considered as giving/accepting bribes or payoffs or kickbacks;
- they are in violation of applicable laws and regulations.
- If a gift, an offer to receive a gift or other personal benefits raises any doubts, one needs to consult his or her Superior or an Ethics Officer before taking any action.
- Any suspected corrupt conduct should be notified to an Immediate Superior or an Ethics Officer.

The rules of conduct in the field of ensuring business integrity and preventing, detecting and dealing with corruption at all levels of the organization are set out in the internal "Procedure for ensuring business integrity and anti-corruption" (P15.0)

## 10. Behaviour outside the workplace

**Companies do not interfere in private lives of its employees. However, our behaviour outside of workplace can have an adverse impact on the quality of our work and on the company image.**

- We remember that even outside of workplace we represent our company and therefore we should be working on maintaining the positive image of our company and avoid situations that could jeopardize its reputation.
- When talking about work-related subjects outside of workplace we present the company standpoint or clearly emphasize that the following is our private opinion.

## 11. Political commitment

**Companies do not engage in any political activities and does not encourage its employees to do so.**

However, every employee has the right to political commitment outside of workplace.

# The Company and its Environment

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## 1. Clients

**We are proud to be a producer of frozen potato products for global brands. We place great importance on maintaining good business relations and satisfactory cooperation with our clients and provide them with professional and reliable service. In relations with our clients:**

- We are committed to providing our clients with products that meet the highest quality standards and are safe for the clients.
- We provide professional and efficient service while being open to the expectations and comments of our clients.
- We provide sincere and complete information about our products, except from company secrets and information protected by law.
- We are responsible for our products and if there is a suspicion that a product does not meet the quality standards, we withdraw it from the market.
- We process complaints in a timely manner and keep the client informed about the progress of the process.
- We protect information gathered during cooperation with our clients.
- We fulfil orders in accordance with the contract terms.

## 2. Business partners

**We find it important to build and maintain the image of a solid and reliable partner. We base our business relations on respect, trust, professionalism and long-term commitment. In cooperation with our business partners, including subcontractors and suppliers of potatoes, foil and packages:**

- We choose our suppliers on the basis of our internal requirements and procedures.
- We inform our business partners about our requirements and standards of conduct.
- When selecting suppliers, we identify any situation that might cause a conflict of interests.
- We rate our business partners fairly, based on clear and objective criteria.
- We respect payment deadlines and other obligations contained in a contract.
- Conflicts and disputes are resolved through dialogue.

### 3. Local community

FFP is located in Lębork and since it was established we stay closely connected with the local community. As we feel responsible for our actions, we make sure that any possible adverse impact is minimized, and positive is increased. We find activities for the benefit of the local community to be our duty, as well as privilege.

In relations with the local community we apply the following rules:

- We inform our community honestly and openly about the company activities that might affect the local area.
- We are sensitive for the needs of our community.
- We initiate and engage in events supporting our local community, according to goals of the sustainable development.

### 4. Natural environment

We feel responsible for continuous improvement of our production processes and other business activities to minimize and prevent negative impact on the environment. We want to meet the expectations of our clients by producing products that are safe for the environment, our employees and the local community.

Our involvement in environmental protection is reflected in:

- Complying with current applicable laws and norms on environmental protection.
- Sustainable and regulated waste management.
- Efficient consumption of utilities, such as water, energy and gas.
- Minimizing possibility of breakdowns and discharge of hazardous substances into the environment.
- Providing trainings and promoting environmental knowledge among our employees.
- Supporting and engaging in local environmental initiatives.

### 5. Competition

We believe that all market participants have equal opportunities and should seek for clients on the basis of product quality and a fair price.

In relation to our competitors:

- We are respectful when speaking about our competitors, both in and outside of our company.

- We are open to cooperation in areas where it is possible.
- We do not engage in industrial espionage, theft or obtaining sensitive information by deception.
- We use only legal sources when researching information for comparison of our competitors product quality.

# Implementation of the Code of Conduct

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## 1. Awareness and availability of the Code

The Code has been developed for all Companies' employees and needs to be respected by all of them, regardless of their position. Every employee must be familiar with the Code and follow its guidelines.

**Executives are responsible for:**

- Providing an example of behaviour compliant with the Code.
- Promoting the Code.
- Informing the subordinates and new employees about the provisions of the Code.
- Preventing violation of the Code.
- Reacting to behaviour violating provisions of the Code.

If any provision of the Code is unclear, an employee can ask the immediate superior or a member of the Ethics Commission for an explanation.

Also, any employee has the right to submit comments and suggestions for amendments in the Code. Those comments can be submitted to any member of the Ethics Commission, who will submit the proposal on the next meeting of the Commission and examine it for possible positive impact on the ethical culture of the company.

## 2. Team of Ethics Officers

The Team of Ethics Officers is composed of 5 up to 8 people representing different departments of Companies. Any employee of the Companies who is not a Superior can become an Ethics Officer. The Ethics Officers shall perform their function without any consideration. The Ethics Officers shall perform their function for an indefinite period and may resign from the same at any time. The Team of Ethics Officers shall meet every 3 months in order to discuss any violations of the Code or Good Practices pertinent to the compliance with the Code and to consider proposals for changes in the Code put forward by Employees or by the Team itself.

**The duties of the Ethics Officers include:**

- To clear up any doubts or answer queries about the Code.
- To examine notifications on possible breaches of the Code.
- To monitor promptness in examining the reports.
- To keep anonymized statistics pertaining to the Ethics Officers' actions.

- To educate about the Code-related conduct and standards.
- To disseminate and promote the provisions of the Code of Ethical Conduct.
- To receive proposals for addenda in the Code submitted by Employees.

### 3. The Ethics Commission

The Ethics Committee is composed of 3 up to 5 people, including a HR director and a lawyer, appointed by the top management of the Companies.

The Members of the Committee shall perform their function for an indefinite period and may resign from the same at any time.

#### The duties of the Ethics Committee include:

- To make decision in respect of notifications of the Code violations submitted by the Ethics Officers.
- To accept proposals for changes in the Code presented by the Ethics Officers.
- Where a notification concerns a member of the Committee, the members of the Board of Directors who are not the members of the Committee shall have the authority to examine the case.
- Where a notification concerns the Board Members, the body to examine the notification shall be the Supervisory Board.
- In case of a risk of conflict of interest and bias of the members of the Ethics Committee, a special committee may be appointed, selected by the top management of the Companies, consisting of employees of the Companies not related to the case.

### 4. Ethics Program Coordinator

The Ethics Program Coordinator is appointed by the top management of the Companies for an indefinite period.

#### The job of the Ethics Program Coordinator is:

- To develop a program of events building a company ethical culture.
- To effect changes in the Code following their acceptance by the Ethics Committee.
- To draw up a schedule for the Team of Ethics Officers meetings.

- To draw up a schedule for employee trainings in issues and problems concerning the Code of Conduct.
- To ensure that there is no conflict of interest during the proceedings conducted by the Ethics Officers and the Ethics Committee.

## 5. Reporting Code violation

All Employees of the Companies and their other stakeholders (including clients, subcontractors, business partners, local community representatives) may notify any cases of the violation of the Code.

The complaints mechanism collects and responds to complaints about a reported issue, which may be based on law, contract, express or implied promises, policies, customary practice or general principles of fairness.

Where convinced that the provisions of the Code have been breached, one may:

1. Take independent actions to remedy such a breach.
2. Notify the breach to his or her Immediate Superior or an Ethics Officer. (Where the solution of a problem falls within the competence and capabilities of the Immediate Superior, the breach need not be notified to an Ethics Officer).

An Ethics Officer may be notified about the Code violation in one of the following ways:

1. A face-to-face meeting.
2. Sending an email to: [etyka.group@ffp.pl](mailto:etyka.group@ffp.pl).
3. Sending a dated letter to the following address: Pełnomocnik ds. etyki/Ethics Officer, Farm Frites Poland SA, ul. Abrahama 13, 84-300 Lębork.
4. Throwing a notification into a box labelled „Ethics” and located in a place preventing possible identification via a video surveillance system.

Where a notification is submitted to an Ethics Officer in a form other than a face-to-face meeting (see points 2,3,4 above), it should provide as much detail as possible:

- Name and surname of the person whom the notification concerns (possibly being in breach of the Code standard)
- Type of the alleged/possible breach as well as the time and place of the same.
- Any available supporting evidence for the occurrence of the breach event.

- Whether the information provided has been given to anyone else before and what the outcome was.
- Whether the notification needs to be proceeded urgently due to danger to life or safety risks.
- The notifying person's name and surname as well as contact details (the notifying person has the right to submit a notification anonymously as well).

A notifying person providing his or her name and surname shall be given a guarantee that his or her personal data will be protected and that he or she will remain anonymous – an Ethics Officer shall not reveal the identity of the notifying person (Whistle Blower) during the investigation procedure, unless the Whistle Blower decides otherwise. The data of the persons whom the notification concerns shall also be protected.

An Ethics Officer shall examine the notification (submitted both during a face-to-face meeting and indirectly) and make a decision on how to categorize the case. The Ethics Officer, with the identity of the notifying person remaining anonymous, may:

- Instigate an investigation procedure or take educational actions (without making, on his or her own, a decision on how to solve the problem).
- Refer the issue to a competent superior or relevant department.
- Decide that the notification be referred to the Ethics Committee.
- Categorize the notification as “*mala fide*” and not take any further steps.

The explanatory proceedings must be completed no later than 3 months from the date of receipt of the notification.

The Ethics Officer is to conclude the proceedings with a relevant decision (problem resolution, abandonment of further actions) and record it in the Ethics Officers Records. The decision is communicated to the whistleblower in writing.

Within 7 days of receiving the decision of the Ethics Officer / Ethics Committee, the employee has the right to appeal against this decision in writing. In this case, a Select Ethics Committee is appointed, which includes an employee representative, a lawyer and a third independent person selected by the Chief Executive Officer from among the employees of the Companies. The Commission has 15 days to consider the appeal and provide a written response to the complainant.

The Ethics Committee shall inform the Company Chief Executive Officer about notifications received based on the Notification Records kept by the Committee.

## 6. Final provisions

The Code is available at [www.ffp.pl](http://www.ffp.pl), in the Intranet as well as from every Ethics Officer. The Code is available in the Polish and English language versions.

The Code has been devised based on the Farm Frites Poland employee expectations and client requirements.

Any breach of the Code will be treated as a breach of employee duties, which may result in penalties provided for in the Workplace Rules & Regulations and other provisions of law.

The Code becomes effective as of 1<sup>st</sup> September 2020.

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