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**Code of Conduct AGRAVIS Raiffeisen AG
"Doing Business in the Green Zone"**



We help things grow.

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Preamble

“Doing Business in the Green Zone”

Beside the quality of its products, today a company is measured against the values that it represents. The conduct of each employee plays a decisive role in this regard.

AGRAVIS stands for trust and integrity. Thus every employee bears responsibility for correct actions, fair cooperation and the reputation of the company. In doing so, AGRAVIS' leading principle is that there is no difference between what we say and what we do.

The Code of Conduct intends to serve each employee as a guide. Its content is built on the principles that characterizes our entrepreneurial activities.

An essential part of the implementation and adherence to these principles is the commitment to an open corporate culture in which people feel safe when they seek advice. AGRAVIS encourages all employees, customers and business partners to openly and directly address their topics and concerns.

Our Code of Conduct provides the right framework to reach these goals. As long as we stay within this framework, we all act within the green area.

Münster, March 2023

The Managing Board

Principles

What we stand for

I. Integrity

We expect our employees to comply with laws and legal requirements as well as with internal policies and instructions. It is important for everyone to know the rules that are relevant for his area of responsibility. Every employee must also be aware that an infringement may have legal and disciplinary consequences.

II. Responsibility

Each employee is required to consider the reputation of AGRAVIS. Above all, our executives must be aware of their role model function. They are responsible for ensuring that the relevant rules are implemented in their area of responsibility and that no legal violations occur that could have been prevented by proper information and supervision.

III. Honesty

Honesty is an essential element of our conduct. Every employee reports truthfully. The requirement for truthful information also applies to the relationship with customers and business partners. Nevertheless, confidential information must be treated confidentially.

IV. Respect

We treat each other with respect. At AGRAVIS, each employee shall receive the same opportunities and is deployed and promoted solely based upon his abilities and achievements. Any form of discrimination, sexual harassment, coercion or verbal attack is not tolerated, nor is any intimidating or abusive behaviour. AGRAVIS supports all employees to have the courage to stand up for each other and for others.

V. Openness

Employees have the right to report circumstances that indicate a violation of laws or internal rules. This possibility should be used in the best interest of the company and the employees. AGRAVIS has appointed an external Ombudsman to whom employees and business partners can report or ask for advice. Such reports are followed up with the utmost care.

VI. Social Awareness

AGRAVIS is aware of its responsibility for the public welfare, education, science and social issues. That is why we grant donations or provide free services. Donations must be appropriate and transparent and consistent with the applicable laws. Donations are not made to individuals, private accounts or persons or organizations that can harm the reputation of AGRAVIS.

Principle

How we act

I. Gifts and Invitations

A polite and respectful way of dealing with business relationships may involve the exchange of gifts or the issuing of invitations. If this involves an attempt to exert an unfair influence on the decisionmaking of the recipient, it may constitute a criminal conduct.

In order to address this risk, we have implemented rules for dealing with gifts and invitations. The first purpose is to protect employees from the appearance of any influence. In principle, gifts and other benefits may be accepted or granted, if they are occasional gifts or other benefits of lower value. Further benefits are to be rejected or returned. Invitations to customary hospitality which are held within an appropriate framework may be accepted or offered.

II. Dealing with Public Officials

Dealing with public officials requires special sensitivity, since there are very strict rules. Even offering an advantage can be punishable.

Public officials include not only civil servants, but all persons who are appointed to perform duties of public administration. This includes judges, civil servants and employees in regulatory and supervisory authorities, e. g. food inspectors, police officers, firemen, mayors or building inspectors. Employees of privatelaw public companies may also be public officials if they perform administration tasks, e. g. executives of energy suppliers or employees of municipal traffic companies.

Thus no advantage should be offered, promised or granted to public officials in general. On the other hand, no advantages may be demanded or accepted by public officials or public servants.

III. Competition and Antitrust

AGRAVIS adhere to the rules of fair competition. Therefore, any contact with companies that pursue the objective of or result in the prevention, restriction or distortion of competition is prohibited. Employees who are contacted by competitors, business partners or third parties for such a purpose must inform the board or Compliance thereof immediately.

AGRAVIS' market position must not be used to enforce prices or agreements. In the event of violation of the antitrust laws, a fine of 10 percent of the company's turnover is possible. Infringements of antitrust may also lead to a criminal investigation against involved employees.

Infringement of competition law does not require precaution. Even negligent behaviour can be illegal. Thus even a harmless contact can be understood as an attempt to signal a competitor the willingness to act in a manner that restricts competition.

IV. Conflicts of Interest

AGRAVIS respects the privacy and is not interested in personal matters beyond the workplace. On the other hand, AGRAVIS expects all employees to be fair and loyal to the company. Thus it is important to separate business and private matters. Personal relationships with a business partner must not lead to a preferential treatment of the business partner.

V. Media and Public Relations

In view of its increasing presence, a sensitive handling of media is necessary. Official company communication is therefore performed exclusively through the board or the corporate communications department. With regard to behaviour in social media, such as Facebook, Internet forums or blogs, it is important that there is a respectful way of dealing with our company as well as with colleagues, customers and business partners.

Principles

What we protect

I. Corporate Assets

Each employee is responsible for the protection and efficient use of the company facilities. Information and documents may not be copied for other than business purposes. It is also not allowed to remove documents or other assets from the company without a businessrelated reason.

When on a business trip, it is important to pay attention to the costconscious handling of the company’s resources. All employees are responsible for a complete and truthful documentation of their business expenses.

II. Information and Data

1. Confidentiality

Confidential information must be kept confidentially. Confidentiality must also be respected regarding information from our customers and business partners, unless the disclosure of such information has been expressly permitted. The obligation to confidentiality also applies after termination of the employment contract or business relationship.

2. Data Protection and Data Safety

Personal data may be collected, processed or used, but only to the extent permissible. The rights of the involved persons shall be considered. Each employee is responsible for the correct handling of his access data.

3. Records and Approval

AGRAVIS expects all records to be complete, truthful and timely in accordance with applicable law. Significant decisions and actions with financial implications must be approved pursuant to the existing internal rules. Relevant knowledge must not be falsified, selectively passed on to or withheld from other employees, as long as primary interests are not to the contrary (e. g., secrecy and confidentiality obligations, copyright provisions or data protection requirements). This requires that information is documented in a way to ensure that authorized employees find the relevant information in a timely manner.

III. Health, Environment and Safety

1. Health

The health of our employees is of extraordinary importance. The workplace is subject to a strict ban on alcohol and other intoxicants. Employees are not allowed to perform hazardous activities if their performance is affected by medicines.

2. Environment

Protecting the environment and preserving natural resources are extremely valuable for AGRAVIS as an agricultural trade and service company. This is why AGRAVIS is continually striving to reduce the impact on the environment by dealing with raw materials in a responsible manner and reducing waste volumes and emissions. This also includes economical energy consumption in our own areas.

3. Workplace Safety

AGRAVIS wants to avoid hazards, accidents and damage as far as possible. The legal basis for occupational safety is, above all, labour protection law and labour safety law. In accordance with legal requirements, we regularly conduct safety trainings. To meet all requirements and to optimize processes, all employees are asked to make suggestions for improvements.

Contact Persons

If you have any questions or suggestions concerning the Code of Conduct, please contact:

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