

Business Ethics

Introduction

As employees in Orifarm, it is important for us to conduct our business with integrity, responsibility and honesty. This Business Code of Ethics (the “Code”) outlines how to handle ethical decisions in our daily work.

The purpose of this Code is to provide employees with an understanding of the principles and ethical values that Orifarm Group wants to uphold. It is designed to affirm and promote our standards of conduct and to reinforce honest, ethical business behavior.

The Code cannot directly cover every issue that might arise, and employees must use sound judgement and common sense in everything that they do on behalf of the Orifarm Group. Any employee who is unsure about any aspect of this Code or its application should contact their manager, the CSR representative or the Legal Department for clarification.

This Code applies globally to any management and employees of all entities of the Orifarm Group.

Gifts and Entertainment

Employees can give gifts in order to protect and develop business relationships. Gifts should be insignificant and not in consideration or expectation of any action by the recipient. Gifts of a value up to 200 EUR (and never cash) are considered to be insignificant.

Employees can accept gifts of insignificant value received for a legitimate business purpose. Gifts of a value up to 200 EUR (and never cash) are considered to be insignificant. Gifts that are not of insignificant value should be returned immediately and reported to your manager. If immediate return is not practical, such gifts should be given to the CSR representative to be disposed of.

Any business entertainment provided to or accepted from anyone doing business with Orifarm must be limited to entertainment that is infrequent, appropriate and intended to serve a business purpose and must never be based on reciprocal action (e.g. a favor), or compromise your ability to make objective and fair business decisions. Always secure there is a clear official program for an event, both when provided or accepted. In question of uncertainty above the guideline, please contact nearest manager for clarification.

Always make sure to familiarize you with guidelines set by local interest organizations or other key stakeholders as well as local common practices.

Conflicts of Interests

Employees are expected to make business decisions and engage in activities that are in the best interest of Orifarm Group. Therefore conflict of interest should be avoided.

A conflict of interest occurs when your personal interests might influence your ability to act objectively and in the best interests of the Orifarm Group. Examples of conflicts of interest includes:

- Family ties, close friends or personal financial interest when selecting suppliers or hiring
- Outside employment with supplier, customers or competitors whilst still employed with Orifarm
- Corporate resource and company time for personal projects

Conflicts of interest can sometimes occur without any action on your part. You must therefore not engage in any activity in which you have, or could be perceived to have, a personal interest. In question of uncertainty above the guideline, please contact nearest manager for clarification.

Confidential

Confidential information includes all non-public information. If disclosed, this information, including third-party information entrusted to the Orifarm Group, might be useful to competitors or harmful to the Group.

You must always maintain the confidentiality of information entrusted to you by Orifarm Group companies or other companies, including the Group's suppliers and customers. Disclosure could cause competitive harm to the Orifarm Group or its suppliers or customers, and could make you or the Group legally liable.

Only official spokespersons or specially denoted representatives may respond to inquiries from the media.

For information about protection of privacy data, please refer to Orifarm's General Privacy Policy.

Anti-trust

Competition law (also known as anti-trust or anti-monopoly law) prohibits conduct that harms competition and consumers.

Examples:

- anti-competitive agreements, such as price fixing, market or customer sharing and bid rigging between companies,
- abuse of market power and not notifying transactions that need to be notified to competition authorities.

Infringement leads to severe penalties at both company, customer and individual level, including large fines, imprisonment and negative reputational coverage. Consequently, it is essential that you adhere to relevant competition laws and regulations. If you are in doubt if something infringes competition law, you should always contact the Legal Department.

Anti-corruption and anti-bribery

The Orifarm Group considers any form of bribery to be dishonest, morally wrong and unacceptable.

Typically, it is illegal to give, or promise to give, money or anything of value to a government official in order to obtain or retain business, or to secure any improper advantage over competitors. Violation can result in severe fines or imprisonment.

If you in rare instances intend to provide any gift or business entertainment to a government official in any country, it must be in strict compliance with applicable anti-corruption laws and in accordance with the procedures and limits of the Orifarm Group.

Fraud, embezzlement and extortion

The Orifarm Group considers any form of fraud, embezzlement and extortion unacceptable and incompatible with the Orifarm Group values.

The Orifarm Group recognizes that fraud, embezzlement and extortion are sensitive matters where it can be difficult to discern whether a boundary has been violated. However, both fraud, embezzlement and extortion are illegal and violation hereof can result in fines or imprisonment. If you are in doubt about an external

party, your own or a colleague's behaviour, you should always contact the Legal Department.

Call to action

Disclosing conflicts of interest or other breaches of this Code is just as important as identifying and avoiding them! You must disclose to your manager, Group HR or the CSR representative any transaction, relationship or action that might reasonably be expected to give rise to a conflict of interest or other breach.

Orifarm also provide all employees to report illegal or unethical behavior via the Orifarm Group Whistleblower scheme that are found on the Orifarm Group intranet.

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