

2022



ETHICAL CODE OF CONDUCT FOR EMPLOYEES





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INTRODUCTION

The work of each of us, the people of AGRIA AD, affects the general reputation of our company.

The way we create and manufacture our products is a key factor in determining the meaning of the products themselves to the community.

The behavior of each employee of AGRIA AD follows the company's core values - integrity and honesty in business, care for the environment and the planet, respect for people, their health and safety, responsibility for the future, compliance with international and national legislation.

The main values of AGRIA AD lay the principles of our policies and programs, guide all the actions of our employees.

We adopt this Code of Ethics with the desire to formulate and reinforce the values of AGRIA AD, so that each of our employees is informed about them and carries out their activities in accordance with the basic principles laid down in this document.

The code of ethics of AGRIA AD defines the expectations of our employees on how we manage our business, how we work with customers, suppliers and partners, what our shareholders require, how AGRIA AD participates in the life of the community.

AGRIA AD's code of ethics was created to ensure that each of our employees follows the company's ethical standards.

The ethical code of conduct at AGRIA AD cannot comprehensively cover all situations and cases that will arise in practice. Each of our employees is responsible for understanding the policies and procedures of AGRIA AD and ensuring that they maintain a high ethical standard in every aspect of their work - even where this Code of Conduct does not provide direct guidance. AGRIA AD employees are expected to demonstrate integrity, common sense and responsibility.

Upon starting work, each employee receives access to the current Code of Conduct for AGRIA AD employees and becomes familiar with it.



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RESPONSIBILITIES OF THE EMPLOYEES OF AGRIA AD:

1. To know the objectives of this Code of Ethics and its content.
2. To know their personal responsibilities and obligations and to conform their actions to the principles laid down in this Code of Ethics.
3. To know the decision-making procedures at AGRIA AD and to comply with them, being guided by the company's values, formulated in this Code of Ethics.
4. To know the resources and procedures for solving ethical issues and problems that have arisen in AGRIA AD.

OUR VALUES

Honesty and integrity in business

AGRIA AD supports free entrepreneurship. We strive for fair and ethical competition within the framework of the competition laws in force both in Bulgaria and in all the countries in which we operate and we will not prevent anyone from freely competing with us. We do not participate in corruption schemes and we do not work with companies that may even be suspected of such.

AGRIA AD participates in an extremely competitive and aggressive market, in the conditions of which we strive to achieve the highest standard in servicing our customers and continuously increase the value of the company. However, regardless of the dynamic environment, AGRIA AD always adheres to the rules of fair competition and does not allow cartel agreements or actions that unreasonably restrict trade or reduce competition. We strictly comply with the antitrust laws of all countries in which we offer our products.

Care for the environment and the planet

The main value of AGRIA AD is sustainable growth while reducing the ecological impact on the environment at every stage of our production. Compliance with the commitment of AGRIA AD and the applicable environmental laws are the responsibility of every employee. The management of AGRIA AD is responsible for training and motivating employees to understand and comply with legal obligations and internal rules, to understand and comply with environmental, health and safety policies, standards and guidelines.



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Respect for people, their health and safety

Respect for the person - basic values in our company are honesty, integrity and respect for people, protection and affirmation of human dignity. We know that success is built on trust and openness, teamwork, professionalism and satisfaction with the work done.

Responsibility for the future and sustainable development

Continuous improvement and innovation – We strive for excellence in everything we do. We constantly invest in new ideas, products and processes to improve the performance of the company and the benefits for our customers.

Compliance with international and national legislation.

OUR RESPONSIBILITIES

To the shareholders – to protect shareholders' investments and provide them with long-term returns that are competitive with other leading companies in the industry.

To the customers- to win and retain customers by developing products that offer value, measured in price, quality, safety and environmental impact, and are the result of proven and proven technological and commercial expertise.

To the employees- to respect the rights of our employees, to provide them with healthy and safe working conditions and competitive working conditions. To support the development of employee talent, creating working conditions that include every employee, providing them with equal opportunities for development. We realize that the success of the company depends on the full commitment of all employees.

To business partners- seek and develop honest relationships with partners and suppliers and promote the application of our business principles and Code of Ethics or equivalent principles in these relationships. Acceptance of these rules by our partners is a prerequisite and an important factor in our choice whether to establish or continue a given business relationship.

To society- to carry out our business activities as responsible corporate members of society, to comply with the current national and international legislation in all territories where we operate. To manage the social impact of business activities and to work for the betterment of the society in which we live.



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To nature- to responsibly manage our impact on the environment, to minimize the negative and increase the positive effects of our activity.

FIRST CHAPTER

ANTI-CORRUPTION AND CONFLICT OF INTEREST

1. Anti-corruption

We at AGRIA AD do honest business. Always and without exception.

Our employees are committed not to be party to any type of corruption or bribery. AGRIA AD treats all business partners equally and fairly, and we compete in the market solely on the basis of the quality of our products and services.

Employees of AGRIA AD do not offer or accept bribes and do everything possible to prevent bribes from other persons who act on behalf of the company, checking to the maximum extent the integrity of those with whom we do business.

We do not allow "facilitation" or "assistance" (e.g. through monetary non-cash benefits or gifts in kind to administrative officials) to facilitate administrative procedures or issue official acts.

Corruption takes many different forms, so employees of AGRIA AD are alert to any suspicious behavior, such as a business partner who asks for unusually high commissions or cash payments or refuses to accept the requirements of AGRIA AD's Code of Ethics. We prefer to miss an opportunity than accept it through corruption.

Bribery - whether offered or accepted, whether in the form of money, goods or services, whether from/to a public official or in the private sector - is always reprehensible behavior and has no place in our business.

2. Conflict of interest

Employees of AGRIA AD should avoid conflicts of interest by ensuring that their personal private activities, occupations and interests do not conflict with their loyalty to the company. The responsibility of the employee is to identify the potential conflict between his private activities and the interest of AGRIA AD, to refer it to the management so that the case can be discussed jointly and the situation can be resolved.



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Conflict of interest may include the following (but not limited to) cases:

- Other labor or equivalent employment.
- Use of inside information and internal resources of the company.
- An employee or a member of his family with a significant financial interest in another company, a competitor of AGRIA AD or one with which AGRIA AD does or plans to do business.
- A family member of an employee who receives personal benefits (for example, from the company's business partners) due to the employee's role in AGRIA AD.
- Any other agreement or circumstance, including family or other personal relationships, which could be perceived as dissuading the employee from acting in the best interest of AGRIA AD.
- Creating romantic relationships between an employee in the company and his direct or higher manager.
- The granting of personal loans by and to an employee of the company and his direct or superior manager.

An employee who is likely to encounter a conflict of interest should discuss the matter with their supervisor or with a Human Resources officer.

SECOND CHAPTER

HUMAN RIGHTS, LABOR AND SOCIAL STANDARDS OF THE EMPLOYEES OF AGRIA AD

We realize that the biggest capital of AGRIA AD is the people who work for us - the people of AGRIA. The quality of the working environment, working conditions, relationships in the teams have a major contribution to the overall success of the company, because all this affects the feeling of a common goal and the motivation of each employee to engage in the achievement of the common result.

Our main priorities in this area are:

1. Respect for each individual employee, regardless of their position and responsibilities, which we demonstrate through:

- **Providing equal opportunities for work and career development without discrimination.**



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AGRIA AD does not allow discrimination against any employee or job candidate due to gender, age, racial or ethnic affiliation, religion, disability, marital status, sexual orientation, gender identity or free expression of opinion.

- **Avoiding harassment in the workplace.**

AGRIA AD does not tolerate insults, violence, harassment and/or ill treatment of employees in the workplace of any kind. This may include, but is not limited to, spreading rumors and slander, making derogatory comments and remarks, offering to pay for work in exchange for sexual or other favors, and other forms of abusive behavior. Harassment may include behavior directed at or by an employee of AGRIA AD, or at and by an employee of the company's customers or suppliers, or other business partners.

AGRIA AD does not tolerate inappropriate use of company computers and/or communication systems. Inappropriate use includes access to sexually oriented and other inappropriate materials, as well as materials that promote sexual, racial, religious or other discrimination. The inappropriate use of the company's electronic communication resources, regardless of the medium, constitutes a serious violation of both labor discipline and the provisions of this Code, and violators will be disciplined.

Employees who are subject to unequal treatment or who have witnessed it, can refer the matter to the Commission for Protection against Discrimination in AGRIA AD or to the Human Resources Department.

2. Respect for human rights

AGRIA AD protects and promotes the observance of basic human rights, formulated in a number of international documents - the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Guidelines of the Organization for Economic Co-operation and Development (OECD) on multinational enterprises, etc.

AGRIA AD undertakes to comply with the above international standards, as well as the relevant national legislation in all countries in which AGRIA AD and its subsidiaries have employees such as:

- It does not allow child labor and does not employ employees who do not meet the minimum age requirement for employment according to the relevant national legislation.
- Strictly follows the requirement of the relevant national legislation regarding occupational health and safety requirements.



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3. Protection of employees right to privacy

AGRIA AD recognizes everyone's right to privacy and protection from unlawful violation of this right. The Company maintains the confidentiality of the personal information of current and former employees and ensures the security of this data.

In its special rules for the protection of personal data, AGRIA AD informs employees about the personal information that the company collects, the purposes of processing, the legal basis, as well as the third parties to whom this information may be disclosed.

When using equipment and services owned by AGRIA AD or those used on behalf of AGRIA AD, employees should keep in mind that they have no reason to protect their right to privacy. The computer and electronic equipment, as well as all other facilities, other equipment and services, such as offices and other premises, cars, telephones, etc., including e-mail, voice mail and access to the Internet and intranet are intended for the business of the company. Employees are not entitled to claim personal privacy when using these facilities, equipment and services. In order to protect the safety and reputation of the company and its employees, to prevent criminal activity and to protect the security of the information of AGRIA AD, the company reserves the right to monitor the above premises, equipment and services of the company, as well as to carry out inspections and inspections in compliance of applicable national legislation.

Upon starting work, each employee familiarizes himself with the internal rules for the protection of personal data at AGRIA AD.

4. Care for the health and safety of employees

AGRIA AD takes care to prevent the risks of occupational accidents, occupational diseases and safety and environmental incidents. The company's goal is to reduce such incidents to zero. Compliance with the internal labor safety rules at AGRIA AD and the applicable safety and health laws is the responsibility of every employee.

AGRIA AD conducts initial occupational safety training for each newly hired employee, as well as periodic and daily (where necessary) occupational safety briefings. The managers in each directorate of the organizational structure of AGRIA AD are responsible for training and motivating employees to understand and comply with the internal safety rules of AGRIA AD and the applicable safety and health laws.

Upon starting work, each employee familiarizes himself with the internal rules for labor safety at AGRIA AD.



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CHAPTER THREE

PROTECTION OF THE ENVIRONMENT - WITH CARE FOR OUR PLANET

As a manufacturer in one of the most complex sectors - the chemical industry, AGRIA AD realizes the value of natural wealth and resources, as well as the importance of a clean environment.

AGRIA AD acts responsibly - we not only comply with all applicable international and national regulations in the field of environmental protection, but we do everything possible to reduce risks and minimize the impact of our production on the environment by introducing innovative technologies and production methods by focusing our research on bioproducts.

AGRIA AD is committed to the development of energy efficiency and climate protection by continuously developing our solutions for the renewal and improvement of our productions.

AGRIA AD uses the necessary resources and products in the most economical way possible throughout the chain to the final product and we strive to act responsibly when we operate our productions and transport our products to different parts of the world.

We recognize that our business requires us to take extra care in environmental, health and safety. This requires extraordinary and special care to reduce risks and prevent accidents. That is why AGRIA AD uses specially developed rules for working and storing raw materials and products.

At AGRIA AD, we ensure that our employees and customers are aware of the risks of working with our raw materials and products and are trained to deal with them responsibly.

At AGRIA AD, we monitor the safety of our products from research and development, through production to application at the end customers. We are constantly improving our products so that we can ensure that they do not pose a risk to people or the environment when used responsibly, as intended and according to the instructions.



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CHAPTER FOUR

PROTECTION OF CONFIDENTIAL INFORMATION

For AGRIA AD, the loyalty of its employees is of key importance. Loyalty includes the commitment of all employees to protect the company's information, which has not been made public by express decision of the management bodies of AGRIA AD. All AGRIA AD employees must protect the company's confidential information from unauthorized access and distribution.

1. Confidential Information are all data and records, regardless of their material medium (paper, computer disk, electronic memory, including telephone, computer server or Internet cloud space, electronic messages), which the employee has learned in connection with and on the occasion of the performance of his work duties and the disclosure of which would result in at least one of the following events:

- They would place AGRIA AD and/or its subsidiary and/or related persons in an unfavorable competitive position vis-à-vis third parties.
- They would disclose the content of commercial, partnership, and any kind of business relationships between third parties and AGRIA AD and/or its subsidiary and/or related persons.
- They would reveal the existence and content of negotiations of third parties with AGRIA AD and/or its subsidiary and/or related persons.
- They would disclose the content of relationships of banking and financial institutions with AGRIA AD and/or its subsidiary and/or related persons.
- They would disclose the content of financial and/or transactions and operations of AGRIA AD and/or its subsidiary and/or related persons.
- They would disclose information regarding ways to access premises, networks, servers, internet cloud space of AGRIA AD and/or its subsidiary and/or related persons.

2. Categories of confidential information

AGRIA AD defines the following categories of confidential information:



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- Business plans and strategies that have not been announced publicly after an express decision of the management bodies of AGRIA AD.
- Information on the prices of raw materials, products, production costs, etc.
- R&D plans and strategies.
- Data and information about the development activity of AGRIA AD, data from and about research, recipes, formulas and product ingredients.
- Information about production processes and technologies.
- Contact information of customers, traders, distributors, partners of AGRIA AD.
- The full content of AGRIA AD contracts, excluding those parts that may constitute public information by law.
- Information related to prices and/or discounts in commercial transactions of AGRIA AD with third parties.
- Information related to the assets of AGRIA AD.
- Information related to currency operations of AGRIA AD.
- Information representing the know-how of AGRIA AD, as well as all information regarding processes and procedures by which AGRIA AD carries out its activities

CHAPTER FIVE

APPLICATION AND COMPLIANCE

1. Compliance with the Ethical Code of Conduct

Every employee at AGRIA JSC gets access to this Code of Conduct through the company's file server, through the information boards in the designated places, through their direct supervisor and/or the Human Resources Department, as well as through the company's official website.

AGRIA AD requires its employees to know, understand and comply with its provisions.



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2. Reporting violations of the Code of Ethics

At AGRIA AD, we expect and rely on employees to notify the responsible persons immediately if they learn or suspect that someone is not complying with the Code of Conduct.

We encourage our employees to speak with whistleblowers or a Human Resources employee when problematic or conflicting situations arise regarding the implementation of this Code of Conduct.

3. Responsibility of AGRIA AD in case of problem or conflict situations

AGRIA AD preserves the confidentiality of the investigation to the maximum extent and works to resolve the violation in accordance with the best business practices, strictly applying national and international legislation.