Green Holding

EMPLOYEES CODE OF CONDUCT GREEN HOLDING GROUP



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I. INTRODUCTION

The Code of Conduct of Green Holding Group Ltd. comprises the fundament of the Companies activities, which, together with other procedures, defines the ethical and moral principles that guide our daily conduct. It is outlined to support us in making the right choices and guide our actions.

This Code is part of the long-term policy of Green Holding Group on sustainability and innovation.

II. MISSION

Our mission is to provide daily access to fresh and safe products that make tasty and varied meals preparation more enjoyable and easier. Thanks to the tailored products and services of Green Holding, our clients gain on returning Consumers and success in sales. We want our products to become the main nutritional component of a healthy and balanced diet.

Our values are People, Appetite for More, Openness to Change, Responsibility, and Entrepreneurship. We are bold in pursuing ambitious projects and constantly look for opportunities to develop our business and improve our operations. We are honest and openminded. We respect Human Rights. We respect the laws of the countries in which we operate. We allow our employees to participate in interesting projects and create opportunities for personal development.

In situations where the Code of Conduct is not applicable, the laws and regulations of the country must be followed.

III. OBJECTIVE

The Code of Principles for Employees defines how we act in our daily operations. Its purpose is to indicate our ethical principles and values to employees and business partners throughout the whole Green Holding Group. It is a reference document designed to express our values as an employer and a company.

The Code does not describe every specific issue or replace existing rules of conduct. The rules established in the workplace must be followed. Contact your supervisor or senior manager immediately if you observe behavior that violates the Code.

We have created a separate Supplier Code of Conduct for our business partners and suppliers.





IV. SCOPE AND TARGET GROUP

This Code of Conduct applies to all employees of Green Holding Group. It applies to boards of directors, full-time and contract employees, and any entities controlled by Green Holding Group (hereinafter referred to as "Green Holding") i.e., entities controlled directly or indirectly by Mr Artur Rytel. The concept of control is to be understood as defined in Article 4(4) of the Law on Competition and Consumer Protection.

V. REGULATIONS AND VALUES

This Code of Conduct serves as a reference point in everything we do. It is the affirmation of our core values derived from years of experience and the strategic vision for the development of companies from Green Holding, such as:

- 1. Respect in the workplace
- 2. Quality and responsible production
- 3. Ethics in operations
- 4. Counteracting conflict of interest
- 5. Confidentiality and personal data protection
- 6. Information technology security
- 7. Sustainable development

The Code of Conduct focuses on areas that set standards for our operations. These include:

1. RESPECT IN THE WORKPLACE

We believe that the success of our company depends on being able to develop and use the potential of our employees. We promote teamwork, in which colleagues share both their successes and failures. We strive to create an atmosphere based on mutual respect, openness, and communication.

Diversity and Engagement

We treat all persons equally, regardless of their gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnicity, religion, sexual orientation, and type of employment — permanent, fixed period, full-time, or part-time.





Employees and job applicants are evaluated based on equality and fair treatment. Our goal is to create a workplace attractive to highly talented and motivated individuals, where they can develop their full potential, regardless of their differences and similarities.

Human Rights

We place great importance on respecting Human Rights and we are committed to providing a safe workplace for all employed in our offices, warehouses, production facilities and farms. In addition, we respect the prohibition of forced labor and the prohibition of child labor.

Discrimination

We focus on ensuring that every employee feels comfortable in their workplace. We do not accept discrimination or unfair treatment of employees or candidates in matters related to recruitment, training, promotions, compensation, or other terms and conditions of employment.

During the recruitment process, we focus on finding the right candidate based on job-related factors, regardless of non-professional issues, such as, in particular, gender, age, disability, race, religion, nationality, political beliefs, ethnicity, religion, and sexual orientation.

Mobbing

Every person is equal in dignity and has a right to be respected. Our goal is to provide a work environment free of offensive behavior, hate speech, physical harassment, and ostracism.

Freedom of Association

Every employee has the right to decide on their union membership and the right to collective bargaining through employee organizations, and in particular trade unions.

Employment Conditions

We comply with all applicable labor laws and regulations, including the minimum wage, working hour requirements, and the minimum age of employment in effect in the country. We strongly oppose all forms of forced labor, child labor (except situations permitted by law), and other forms of exploitation of children and minority groups.

Occupational Health and Safety

We strive to create a safe workplace and emphasize compliance with health and safety regulations. Each employee should safely perform their work and comply with the rules set by Employer at their workplace. Any accidents, cases of dangerous or potentially dangerous activities must be reported immediately to the relevant departments of the company.





2. QUALITY AND RESPONSIBLE PRODUCTION

The respect and trust of our customers continually encourage us to ensure the quality and safety of our products. We employ rigorous evaluation methods for the products offered under all our brands. We focus on innovation, ethics, and responsible manufacturing of our products.

We provide reliable communication about our products. Our marketing programs comply with applicable laws and regulations, including guidelines for marketing to children.

Our cooperation with customers underscores the quality and value we place on working with them. All sales and marketing agreements should be made in writing and in accordance with our policies.

We continuously monitor our suppliers through numerous quality and social audits. We have created a Supplier Code of Conduct, which obligates them to comply with our standards and is a condition for working with us.

3. ETHICS IN OPERATIONS

The Code of Conduct outlines our commitment to conduct business in accordance with applicable laws and the highest ethical standards, ensuring that risks related to work, business, the environment, and the law are controlled.

4. COUNTERACTING CONFLICT OF INTEREST

We adhere to the highest ethical standards; therefore, we pay special attention to conflicts of interest. One should avoid all situations where private interests may conflict with those of the company. When contacting current or potential customers or suppliers, company employees must act in the company's interests. Conflicts of interest can arise in the following situations:

- making business decisions under the influence of personal, family, or social relationships or creating the impression that such influence exists

- having any disclosed or undisclosed interest in a cooperating or competing company

- using company property, information, or resources to benefit yourself or others

- conducting transactions with former employees and transactions in which close friends or relatives of the employee are directly involved.

In the case of a potential conflict of interest, it is essential to inform your supervisor and await the company's decision on how to proceed.





Private Business Activity

Integrity and loyalty are essential regarding employees private activities that may affect the Company's business. Each employee must obtain prior written approval from their supervisor or human resources department to perform additional tasks and work during their free time if such activities may conflict or appear to conflict with current or planned activities of the Companies, adversely affect the image of the Subsidiaries, or require the use of Company premises or equipment.

Counteracting Corruption and Bribery

Corruption and bribery are incompatible with Green Holding Company's vision, as they are destructive to the company. Our employees must not accept or offer any valuable benefit to anyone to gain an unfair competitive advantage or other benefits, particularly when cooperating with public officials. Such benefits may include but are not limited to cash, gifts to family members, business opportunities, entertainment expenses, meals, travel, political and charitable donations.

To ensure compliance with the anti-corruption law, no employee should ever directly or indirectly offer anything of value, including but not limited to a gift or entertainment, to any government official.

Representation

We recognize that certain cultural conditions consider it a good business practice to give gifts of reasonable value, especially during holidays.

The giving of items of value, the giving of gifts, the display of hospitality, or shared entertainment are often essential elements of conducting our business. Any gift or entertainment expense must be approved in advance by a supervisor. Events involving employees must never negatively affect the company's reputation.

Employees may accept gifts if their value is at most the equivalent of 200 zlotys (50 euros) and if they do not inappropriately affect the evaluation of business relations.

Counteracting Money Laundering

We follow all applicable rules, regulations, and practices in accounting and recordkeeping. As employees, we must also ensure that no sum is diverted for any purpose other than what is accurately stated in the books and records.

The company must not create undisclosed or unrecorded accounts for any purpose. Making false or artificial entries in books and records is prohibited.

Always work with reputable clients who conduct legitimate business using legitimate financial sources.





Protection of Competition

We respect good business practices. All our business activities are conducted in accordance with applicable antitrust and competition laws.

5. CONFIDENTIALITY AND PERSONAL DATA PROTECTION

We respect the privacy rights of our employees and business partners; therefore, we only acquire data necessary for the proper operation of the Green Holding Group.

Confidential Information

We respect the confidentiality of the personal information of all our stakeholders, including employees, consumers, and business partners. Any information about customers, suppliers, or business partners that has economic value and has not been made public is confidential.

Personal Data Protection

Personal data on employees include: contact information, i.e., name, home address, telephone numbers, and e-mail addresses; identification numbers assigned by government agencies; financial information, such as bank account details, payout amount, and other compensation information; employment information, such as employment contract details, social benefits, and absences.

Personal data is always protected until it is securely deleted.

Data protection policies follow local laws.

6. INFORMATION TECHNOLOGY SECURITY

Information systems are a critical component of our business and are intended only to conduct approved business activities.

To protect our information systems, you should never:

- share passwords to Green Holding's systems with anyone

- leave laptops or other mobile devices unattended while traveling or in places where they may be stolen

- download unauthorized or unlicensed software on company computers

In any situation where employees use IT systems, company e-mail, and all company domains and mailboxes, they act on behalf of the company. Therefore, they must do so in an ethical manner that complies with the law and the company's policies and values.



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If you suspect a data security breach or become aware of a data breach, including the theft or loss of a laptop or other portable device, immediately inform your supervisor, local support team, or Help Desk.

7. SUSTAINABLE DEVELOPMENT

As one of the largest producers of lettuce and healthy fresh food, we want to become a leader in sustainability. We aim to reduce our negative environmental impact and promote healthy eating habits. That means supplying responsible products with respect for the environment and people. We have developed a Sustainability Strategy that covers four key areas:

- Environment
- Our employees and support of local communities
- Innovative products
- Logistics

We approach the environment respectfully and are committed to reporting on all our achievements in this area. In addition, we are committed to building awareness among our employees by implementing environmentally friendly procedures. We take a number of measures related to environmental protection, such as using renewable energy, optimizing water consumption, reducing waste generation, and using environmentally friendly packaging.



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