

## ANNEX 2.10

### CODE OF CONDUCT OF ASTARTA HOLDING N.V.

This code of conduct (the “Code of Conduct”) shall ensure that our employees conduct business in line with our generally agreed corporate business values, guidelines and principles as incorporated herein. This Code of Conduct was adopted on 28 May 2021 and will be effective as of 28 May 2021

#### I. Preamble

This Code is developed on the basis of the effective legislation of Ukraine and generally recognized principles and standards of business integrity, and is a local regulatory act that is binding for all enterprises of the Company. The Code does not describe all possible cases and situations that an employee may encounter in the performance of their official duties, but it does contain basic principles for solving difficult ethics-related situations. The Code sets out and systematizes the rules and principles of conduct that all employees of the Company must adhere to

#### II. Terms and Definitions

In this Code, the following terms have the meaning set out below:

**The Company** - means the Agroindustrialholding Astarta, which includes all legal entities connected with Astarta Holding N.V. by control relations

**The Company's Code of Corporate (Business) Conduct** - is a set of regulations, rules and principles that determine the ethics of mutual relations within the Company, as well as the Company's mutual relations with partners, counterparties and other parties concerned.

**Counterparties** - are individuals, legal entities, institutions and organizations associated with the Company by liabilities under the general agreement, and/or cooperation in the process of their fulfilment (customers, suppliers, contractors, investors, etc.).

**Affiliated persons** - are individuals or legal entities that may have a direct or indirect impact on the official decision-making of the Company's employee.

**Conflict of interest** - is a situation in which the personal interest of an employee or their relatives affects or may affect the objective performance of official duties and may lead to a contradiction between the personal interests of employees and the interests of the Company.

**Difficult ethics-related situation** - is a situation when ideas about the morality of an employee, on one hand, collide with the Company's ones on the other.

#### III. Purpose and Objectives of the Code

**Purpose of the Code** - is to establish corporate standards of business integrity of the Company and regulate the activities of the Company's employees in Difficult Ethics-Related Situations.

#### **Objectives of the Code are the following:**

- to establish principles of the Company's corporate conduct based on the Mission and Corporate Values of the Company;
- to guide employees to understand, support and comply with uniform principles of business conduct;

## IV. Scope of the Code

4.1. This Code contains generally binding rules of conduct that apply to all employees of the Company, regardless of the level of their position.

4.2. All documents of the Company, including those that formalize relations with customers, business partners, government authorities, competitors and employees of the Company, are developed and approved subject to the provisions hereof.

4.3. The provisions of this Code are approved by the general meeting of shareholders of the Company and are subject to review at least once every four years.

4.4. The provisions of this Code are binding for all partners of the Company who represent the interests and act on behalf of and in the interests of Agroindustrialholding's subsidiaries.

## V. The Company's Mission

We are a vertically integrated Agroindustrial holding in Ukraine, a public European company that carries out socially responsible business activities and manufactures food products with a focus on global markets.

We are building a high-tech innovative company in Ukraine with a world-recognized brand and an impeccable reputation, attractive to shareholders and partners, which manufactures the highest quality products for the most demanding consumers and provides an opportunity for effective self-fulfilment to each of its employees.

Our goal is to build a strong Ukraine and strengthen its credibility in the world by unleashing and increasing the potential of the Ukrainian land and people and inspiring society with our example of doing business based on the principles of fair partnership, ethics and development.

In order to improve our performance, we introduce a culture of lean manufacturing and energy-efficient technologies within the holding.

By actively participating in shaping our business environment and society as a whole, we are guided by the principles of sustainable development, building a public-private partnership developing cooperation with industry and professional associations, trade unions and local authorities, promoting the development of vocational education and applied scientific researches in the country.

## VI. Corporate Values

We fulfil our Mission based on our values:

### 6.1. Impeccable business reputation

Each team member solves any tasks on a daily basis and takes care of maintaining and ensuring an impeccable business reputation of the Company. We do not allow ourselves and our partners to violate effective legislation, we defend the principles of justice and honesty.

### 6.2. Social responsibility.

We are responsible for the quality and procedures of product creation by all enterprises of our Company, to consumers, employees, partners, take an active social position, which consists in harmonious coexistence, interaction and ongoing dialogue with society, participation in addressing acute social issues.

By setting a goal for social responsibility we

- promote sustainable development, including the health and well-being of society;
- consider the expectations of parties concerned.

The principle of social responsibility is integrated into the activities of all structural subdivisions of the Company.

### 6.3. Respect for partners

When building cooperation with our partners, we take into account not only the interests of the Company but also the interests of our partners, strive for cooperation on mutually beneficial terms and make every effort to protect the rights and interests of third parties when implementing the Company's business strategy.

Our goal is to establish a long-term and synergistic partnership with a focus on results. We gain the loyalty and trust of our partners by doing business only by fair means and in accordance with the standards of business integrity.

### 6.4. Quality of goods and services

We are constantly working on important innovations, the individualization of our solutions, and the implementation of industry-wide quality and compliance systems. Certification of manufacturing processes and our specialists is the Company's standard practice. We strive for leadership, strive forward, and look for opportunities to constantly learn and develop.

### 6.5. Conscientious performance of official duties

Say "How can you do?" instead of "You can't". We get rid of conformity and fear of change, a careless attitude to the Company's resources and the predominance of our own interests over team ones. The responsible work of each employee is a contribution to the common cause and leads to the achievement of common goals of the team. Correcting mistakes and learning, constantly improving and making our work better are the principles of each employee and the Company as a whole.

### 6.6. Respect for colleagues and management team of the Company

Promoting a friendly environment based on respect for each individual and creating environment for their development. Focus on working together to achieve a common result.

## VII. PRINCIPLES OF CORPORATE CONDUCT OF THE COMPANY

- The Company builds its activities on the principles of recognition of the rule of law in all spheres of socio-economic life.
- The Company builds relationships with its employees on the principles of respect for Human Rights and personal dignity, creating equal opportunities for employees.
- The Company builds dialogue and relationships with local communities, state authorities and local self-government on the principles of openness, partnership and cooperation.
- The Company builds relationships with counterparties on the principles of honesty, objectivity and integrity.

- The Company builds relationships with competitors on the principles of free and fair competition with strict compliance with the standards of business integrity.
- The Company does not participate in political or religious activities.
- The Company is fully aware of its responsibility to society for the preservation of the environment and considers its activities in the field of Environmental Protection as an integral part of successful business operations and a prerequisite for achieving its strategic goals;
- The Company actively participates in the local communities development, social partnership projects support and provides charitable assistance.

## VIII. PRINCIPLES OF CORPORATE CONDUCT OF THE COMPANY'S EMPLOYEE

### 8.1 Employee-Company relationships

Employees build their relationships with the Company on the principles of loyalty to the Company, conscientious compliance and implementation of policies, regulations, standing orders, instructions and other internal regulatory documents of the Company, strict compliance with the statutory provision.

Employees are the basis of the Company's reputation. Therefore, it is necessary to understand that any unethical or illegal actions committed in the workplace or in one's spare time can harm the Company's reputation.

### 8.2. Relationships between the Company's employees

Relationships between employees of the Company, regardless of their position or field of activity, are based on the principles of mutual respect and assistance, openness and goodwill, teamwork and cooperation orientation.

Any form of disrespectful or offensive attitude towards each other is unacceptable.

The Company has a mentoring program, and experienced employees pass on their experience to young colleagues who have joined the team.

### 8.3. Relationships between managers and subordinates

The relationship between managers and subordinates is based on the principles of openness of management towards employees, providing managers with equal opportunities for all their subordinates to perform their duties, supporting the initiative of subordinates, understanding the specifics of the work of subordinates and responsibility for their work results, impartiality and fair assessment of their subordinates' performance.

Relationships between subordinates and managers are based on the principles of respect, discipline and subordination, conscientious performance of both their direct official duties and other management tasks that are not described in the job descriptions, but directly related to the scope and specifics of the Company's division's activities.

### 8.4. Relationships with Counterparties

In their relationships with Counterparties, the Company's employees should be guided by the principles of respect and goodwill, the priority of the company's interests, objectivity, and economic feasibility.

Employees should not disclose information about counterparties that may cause them or the Company material or other damage, except in cases where the disclosure of such information is prescribed by law.

#### 8.5. Relationships with affiliated persons

Employees of the Company should avoid involving affiliates as Counterparties. Employees should not participate in making decisions on cooperation with affiliates; if there is a production need to involve affiliates in cooperation with the Company, the employee should contact their direct supervisor and inform about the existence of a conflict of interest.

#### 8.6. Confidentiality and non-disclosure of information

Employees are required to comply with the Company's terms of commercial secret non-disclosure and maintain the confidentiality of information obtained during the performance of their official duties.

#### 8.7. Public activities

Employees of the Company can be engaged in any political, religious or public activity that is not prohibited by law, provided that they are conducted in their free time and outside the workplace.

Employees should not use the Company's name, financial, material, or any other Company resources to fulfil their political, religious, or social activities.

#### 8.8. Use of the Company resources

Employees are required to take maximum care of the property and other resources provided by the Company and use them exclusively for work purposes.

#### 8.9. CONFLICT OF INTERESTS

Employees of the Company should avoid situations that may lead to a conflict of personal interests and the interests of the Company:

- receiving funds, gifts or remuneration in any other form transferred for the purpose of influencing the course of making and/or the result of an official decision by an employee of the Company;
- using the Company's name, reputation, material, financial or other resources, confidential information for the purpose of obtaining their own benefit;
- other situations that may lead to adverse consequences for the Company.

In the case of a conflict of interest or the possibility of such a conflict, a Company's employee should contact their immediate supervisor for assistance in settling the situation.

If it is impossible for a direct manager to resolve a conflict of interest, the employee has the right to seek for the assistance of a senior manager, up to the CEO of the Company.

### IX. FINAL PROVISIONS

This Code will be published on the Company's website upon its approval.

All employees and officials of the Company are required to read this Code and follow the principles described in the Code; each employee is personally responsible for compliance with

the Code. If it is impossible for an employee to solve a difficult ethics-related situation on their own, they should contact their immediate supervisor for help.

The manager is responsible for the implementation of the Code by their subordinates, helps them correctly interpret the rules and standards of ethical behaviour, and also shows a personal example of high business integrity of an employee of the Company. None of the employees or managers of the Company has the right to perform or approve any action in violation of this Code.