

SUPPLIER CODE OF CONDUCT

1. GENERAL PRINCIPLES

- 1.1. Astarta or Company is a vertically integrated Agro-Industrial Holding “Astarta-Kyiv”, running a socially responsible business and producing food commodities with a focus on global markets.
 - 1.2. Astarta is a public European agrifood company with assets in Ukraine, producing high-quality products and feed ingredients responsibly, ensuring a traceable supply chain — from cultivation and processing to consumption.
 - 1.3. Innovation and sustainability drive our operations, as we balance economic growth with environmental responsibility and people-centric approach.
 - 1.4. Astarta is committed to integrating into global supply chains, becoming a trusted partner for industry leaders, and setting the standard for sustainable and responsible Ukrainian business. With long-term vision and commitment to future generations, we collaborate with partners, local communities, teams, and shareholders to build resilient ecosystems and create meaningful social impact projects in regions of our presence.
 - 1.5. Our calling is to strengthen Ukraine and enhance global trust in our nation by unlocking and amplifying the potential of Ukrainian land and people. We aim to inspire society by our example of doing business with integrity, ethical partnership, and deep commitment to sustainable development.
 - 1.6. Our suppliers play a key role in achieving the goals of sustainable development and in upholding the trust of our stakeholders. The Company expects our suppliers to align with our values and operate to the highest standards in human rights, safety, working conditions, ethics, and environmental performance.
- 1.1. The principles set out in this Supplier Code of Conduct define the Company’s fundamental requirements regarding the ethical, social, and operational conduct of suppliers and constitute one of the key criteria for their selection, assessment, and ongoing cooperation. The Company adheres to these principles in its own activities and expects all suppliers and other partners involved in the supply chain to comply with them.

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2. ENVIRONMENTAL PRINCIPLES

2.1. Management of Impacts, Risks, and Opportunities

Astarta expects that:

- Suppliers shall establish and maintain an environmental and social management system commensurate with the nature and scale of their operations, taking into account due diligence principles as well as the level of associated risks and impacts. This system shall ensure systematic identification and assessment of environmental impacts, risks, and opportunities arising from all related activities.
- Furthermore, suppliers shall develop and implement clear strategies, set measurable and achievable targets, and institute effective control measures to proactively and reduce the negative environmental impacts of their operations.

2.2. Climate change

Astarta expects suppliers to measure and report all greenhouse gas (GHG) emissions across their entire value creation chain. This includes GHG categories Scope 1, Scope 2, and all applicable Scope 3 categories, where applicable.

Furthermore, suppliers must conduct a formal assessment of climate-related risks and opportunities. This assessment shall directly inform the development and implementation of a verifiable decarbonization strategy aimed at reducing GHG emissions in alignment with the objectives of The Paris Agreement and internationally recognised climate frameworks.

2.3. Pollution prevention

Astarta expects that suppliers:

- strictly comply with all applicable environmental legislation and must obtain and maintain all required environmental permits and licenses. Suppliers must responsibly manage air emissions, wastewater and waste discharges, ensuring compliance with all environmental regulatory requirements.
- implement comprehensive measures to prevent pollutant release into the environment and to establish robust protocols that minimize the risk of accidents, emergencies, or other incidents that may cause environmental harm. To verify continuous compliance, suppliers shall conduct systematic environmental monitoring and maintain records demonstrating adherence to established discharge limits.

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2. ENVIRONMENTAL PRINCIPLES

2.4. Water resources

Astarta expects that suppliers shall ensure the rational and efficient use of water resources, with a mandatory focus on minimising water consumption and loss throughout all production processes.

Any activity related to water withdrawal, use, or discharge must strictly comply with the requirements of all current water and environmental legislation and permit requirements.

2.5. Biodiversity and Forest Preservation

Astarta expects that suppliers:

- treat biodiversity and ecosystems responsibly, minimising their impact on them.
- implement measures aimed at preserving and supporting biodiversity within their economic activities, in particular: implementing regenerative farming practices, proper use of plant protection products and fertilizers, implementing measures to improve soil quality and prevent erosion, and other measures aimed at preserving and avoiding negative impacts on ecosystems.
- undertake not to use raw materials obtained as a result of deforestation or forest degradation, and to exclude any economic activity that leads to the destruction or damage of primary forests or particularly valuable protective forests.
- adhere to a strict non-deforestation policy and protect forests and areas of high biodiversity value.

2.6. Resource Use and Circular Economy

Astarta expects that suppliers:

- implement effective technologies and planned measures aimed at reducing the consumption of natural resources and materials across their operations and strategic planning.
- recognise the circular economy as a key element of our sustainable business development, suppliers are required to actively increase the proportion of materials or waste directed toward reuse, recycling, and other recovery operations. This commitment is essential for minimising overall waste generation.

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2. ENVIRONMENTAL PRINCIPLES

2.7. Waste

Astarta expects that suppliers shall strictly comply with all applicable laws and regulations governing waste management. It is a mandatory requirement to implement effective measures to reduce waste generation at every stage of the production cycle, with particular focus on the minimisation of hazardous waste.

Suppliers must ensure proper sorting and authorised transfer of all waste for appropriate processing. This includes mandatory training for employees on correct waste handling and management procedures.

2.8. Hazardous Materials

Astarta expects that suppliers shall ensure the safe management, storage, and handling of all hazardous materials and substances used in their operations. This includes maintaining up-to-date inventories, clear labelling, and secure containment systems to prevent pollution.

2.9. Chemicals Usage

Astarta expects that suppliers shall align their activities with all applicable Ukrainian regulations, international standards and recognised best practices, including requirements relating to the registration, labelling, safe storage, use and disposal of chemical substances.

2.10. Pest Management System (PMS)

Astarta expects that suppliers shall implement a robust Pest Management System to ensure the proper handling, secure storage, safe application, and responsible disposal of agrochemicals and associated waste. Furthermore, the Supplier must:

- Strictly prohibit the use of chemicals banned or severely restricted under international conventions.
- Actively promote and prioritize non-chemical pest control methods whenever technically and economically feasible.

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3. HUMAN RIGHTS AND LABOUR RIGHTS

The Company recognises respect for human rights as a fundamental principle of sustainable development and expects its suppliers to unconditionally adhere to internationally recognised human rights in all areas of their operations.

Suppliers are required to respect the dignity of every worker, prohibit all forms of exploitation, discrimination, harassment, or violence, and ensure fair, safe, and inclusive working conditions.

All suppliers must comply with the following frameworks:

- The United Nations Universal Declaration of Human Rights,
- The Core Conventions of the International Labour Organization (ILO),
- The United Nations Guiding Principles on Business and Human Rights (UNGPs),
- The Constitution and labour legislation of Ukraine.

These requirements apply to all suppliers, including subcontracted workers and temporary staff.

3.1. Prohibition of Forced Labour

Suppliers shall not use any form of forced, bonded or compulsory labour. Employees have the right to freely terminate their employment with prior notice in accordance with applicable law.

3.2. Prohibition of Child Labour

Suppliers shall not employ individuals below the minimum age defined by applicable legislation. The employment of minors is only permitted under conditions that fully comply with all applicable protections and safeguards.

3.3. Freedom of Association and Collective Bargaining

Suppliers recognise the right of employees to form trade unions and participate in collective bargaining without fear of reprisals.



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3. HUMAN RIGHTS AND LABOUR RIGHTS

3.4. Non-Discrimination, Equality, and Inclusiveness

The Company expects suppliers to commit to the principle of equality in all aspects of employment, including recruitment, remuneration, professional development, promotion, termination and access to training, and to ensure a work environment free from any form of discrimination, harassment, or persecution.

Suppliers shall comply with the Company's Policy on Prevention and Combating Discrimination, Sexual Exploitation, Violence and Harassment, which prohibits any direct or indirect discrimination on any grounds defined by Ukrainian legislation and international human rights standards.

The Company also expects suppliers to promote equal access to employment and prevent restrictions against women, persons with disabilities, veterans and individuals from vulnerable groups, including internally displaced persons.

3.5. Prevention of Violence, Harassment, and Abuse

Suppliers are required to ensure a work environment free from all forms of physical, psychological, and sexual violence, harassment, or abuse. The Company does not tolerate any actions that demean the dignity of workers, create a hostile atmosphere, or cause fear. Suppliers must implement policies to prevent workplace violence, establish confidential grievance mechanisms, and take immediate corrective actions in confirmed cases of violations.

3.6. Employment Conditions

The Company expects that all workers engaged on behalf of the supplier have a valid employment contract in accordance with Ukrainian legislation. Hidden employment, misuse of subcontracting agreements, or probationary periods are not permitted.

3.7. Working Hours and Rest Periods

Suppliers are obliged to comply with labor legislation requirements regarding working hours, work schedules, breaks, rest days, and leave entitlements, and ensure that:

- the established working hours comply with legal norms.
- overtime work is performed only on lawful grounds, is voluntary, recorded, and appropriately compensated;
- workers are guaranteed the right to daily and weekly rest periods, annual paid leave, as well as other types of leave in accordance with legislation.

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3.8. Working Time Records

Suppliers shall maintain accurate working time records and ensure that employees have access to information regarding their schedules.

3.9. Remuneration and Social Benefits

Astarta expects that suppliers:

- shall provide timely, fair, and lawful remuneration to all workers, adhering not only to minimum legal standards but also to the principles of decent work.
- remuneration must not be lower than the legally established minimum wage, regardless of the payment method (hourly, piece-rate, or combined). Wages shall be paid at least twice a month, within the deadlines specified in the employment contract or collective agreement, including all applicable premiums for night shifts, holidays, and overtime work.
- informal payments and any unlawful deductions are strictly prohibited. The supplier must ensure equal pay for work of equal value, regardless of gender, age, origin, disability, or any other protected characteristic.
- ensure all legally mandated social payments and contributions, including: full payment of the Single Social Contribution (SSC), provision of paid leave (both basic and additional), payment of temporary disability benefits, maternity leave, childcare leave in accordance with legislation, and observance of guarantees for mobilized and conscripted individuals in accordance with the Law of Ukraine "On Social and Legal Protection of Servicemen and Their Families," as well as other requirements stipulated by the applicable legislation governing the supplier.

3.10. Mechanisms for Protecting Workers' Rights

Astarta expects that suppliers shall provide a confidential and secure mechanism for reporting violations. Suppliers shall have procedures for addressing grievances, including sexual harassment/gender-based violence, using a survivor-centered approach. No worker shall face punishment or retaliation for filing complaints or participating in trade unions.

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3. HUMAN RIGHTS AND LABOUR RIGHTS

3.11. Occupational Health and Safety

Astarta expects that suppliers shall provide safe and healthy working conditions for all its employees, strictly complying with Ukrainian occupational health and safety legislation as well as international standards, including ILO conventions. This entails establishing an effective occupational health and safety management system, regularly assessing and minimising occupational risks, providing workers with necessary personal and collective protective equipment, and conducting mandatory training and safety briefings.

Suppliers bear full responsibility for preventing workplace injuries, occupational diseases, and incidents. The Company reserves the right to conduct audits to verify compliance with these requirements.

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4. ETHICS AND INTEGRITY IN BUSINESS CONDUCT

Suppliers cooperating with the Company undertake to conduct their activities responsibly, transparently, and in accordance with the business ethics standards set out in the Company's internal policies and regulatory documents.

4.1. Anti-Corruption and Bribery

Astarta expects that suppliers shall comply with anti-corruption legislation in all jurisdictions in which they operate, as well as with the Company's Anti-Corruption Policy.

Suppliers are prohibited from offering, providing, soliciting, or accepting any gifts, money, services, or other material or intangible benefits with the purpose of obtaining an undue advantage or influencing decisions in favor of the supplier, the Company, its employees, their family members, business partners, or any third parties.

Gifts and business hospitality are part of accepted business practice and may contribute to the development of trust-based partnerships. However, they shall be offered and accepted only in an ethical, reasonable and transparent manner that does not create real or perceived obligations, does not influence objective decision-making and does not compromise the professional reputation of the Company, its employees, suppliers or their employees.

The Company expects employees and other persons acting on its behalf, as well as suppliers and their employees, give and receive gifts and business hospitality solely in an ethical, proportionate and lawful manner that does not create an actual or potential conflict of interest and does not call into question their impartiality or the objectivity of decision-making.

4.2. Anti-Money Laundering and Counter-Terrorism Financing

The Company maintains zero tolerance towards activities related to money laundering or the financing of terrorism, including any actions involving the concealment or legitimisation of the illicit origin of assets.

Astarta expects that:

- suppliers shall comply with all applicable laws and regulations aimed at preventing money laundering, terrorism financing, and other financial crimes in the jurisdictions where they operate.
- implement appropriate due diligence (CDD) procedures for their counterparties, verify ultimate beneficial ownership, monitor transactions, and promptly report any suspicious activities to the competent authorities.

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4. ETHICS AND INTEGRITY IN BUSINESS CONDUCT

4.3. Fair Competition

The Company supports an open market and transparent relationships with its partners and expects its suppliers to adhere to the principles of fair competition. Suppliers must not engage in collusion, price manipulation, or any other anti-competitive practices.

Suppliers are strictly prohibited from exchanging confidential information with competitors, engaging in bid-rigging, or coordinating market behavior. Abuse of a dominant market position, discrimination against counterparties, or the imposition of unfair trading conditions is not allowed.

The Company expects suppliers to conduct their business ethically, honestly, and in full compliance with applicable antitrust and competition laws in all jurisdictions where they operate.

4.4. Conflict of Interest Prevention

Suppliers must identify, avoid, and disclose all actual and potential conflicts of interest.

A conflict of interest refers to any actual or potential divergence between an individual's personal interests and their official or professional duties that may compromise objectivity and impartiality in decision-making and may lead to reputational and/or financial harm.

The Company expects suppliers to comply with Company's Code of Business Ethics and conflict of interest management policies, promptly report any circumstances that may give rise to a conflict of interest and refrain from making decisions or entering into agreements where a conflict of interest exists.

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4. ETHICS AND INTEGRITY IN BUSINESS CONDUCT

4.5. Compliance with Sanctions and Trade Restrictions

Suppliers must strictly comply with all applicable sanctions and embargoes imposed by the United Nations Security Council, the United States of America, the European Union, Ukraine, the United Kingdom, and any other jurisdictions or international bodies whose decisions are legally binding for the supplier.

The Company expects suppliers to implement and maintain an effective sanctions compliance control system and avoid transactions involving sanctions risks.

Suppliers are also expected to comply with the Company`s Sanctions Policy and with all applicable sanctions legislation in all jurisdictions where they operate. Suppliers shall ensure that neither they, nor their ultimate beneficial owners, subsidiaries, officers, authorised representatives, or employees with signing authority are designated as sanctioned entities, are residents of a sanctioned jurisdiction, are directly or indirectly controlled by sanctioned entities, engage in any business or financial dealings with them, or receive funds or other assets from such entities.

4.6. Reporting Mechanisms and Whistleblower Protection

The Company recognises whistleblowers as a key mechanism for preventing corruption and other violations and ensures the protection of their rights and guarantees in accordance with legislation and international best practices. The Company fosters an internal environment in which good-faith reporting of violations or potential violations is encouraged, treated as responsible behaviour and supported by appropriate levels of confidentiality, security and protection against retaliation. The Company has established and maintains reporting channels available at: <https://astarta.ethics.help/web/uk>

The Company guarantees absolute confidentiality of whistleblower identity. Information relating to whistleblowers, their close associates or any data that may identify them is stored under restricted access and shall not be disclosed without the whistleblower's consent, except as required by law. Any form of retaliation, harassment, discrimination or pressure against whistleblowers is strictly prohibited.

The Company expects suppliers to implement similar approaches and mechanisms, including confidential and secure reporting channels and procedures for handling complaints, including those related to sexual harassment or other forms of violence, using a survivor-centred approach. No employee shall be penalised or retaliated against for filing complaints or participating in trade unions.

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5. INFORMATION SECURITY, PERSONAL DATA PROTECTION AND CYBERSECURITY

5.1. Protection of Confidential Information and Personal Data

Suppliers must comply with national legislation on the protection of confidential information and personal data. The Company also expects suppliers to adhere to applicable international regulations in all jurisdictions where they operate, including the General Data Protection Regulation (GDPR), ISO 27001 information security recommendations and the EU NIS2 Cybersecurity Directive, where their requirements apply to the supplier's activities.

Suppliers are required to implement appropriate organizational and technical measures to ensure the security of Company's commercial, financial, personal and other confidential information, as well as that of its partners and counterparties, from unauthorised access, loss, destruction or disclosure. The transfer, use or disclosure of such information to third parties is permitted only within contractual relationships and subject to the Company's prior written consent, unless otherwise required by law.

5.2. Cybersecurity

Suppliers shall implement and maintain an appropriate level of cybersecurity to prevent unauthorised access to information systems, data breaches, loss or compromise of data processed within the framework of cooperation with the Company.

In the event of a cybersecurity incident that may affect the Company's information assets, the supplier shall immediately notify the Company without delay and fully cooperate to contain the incident, minimise its consequences and prevent recurrence.

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6. SAFETY, RESPONSIBLE SOURCING AND WELL-BEING

6.1. Community Health, Safety and Security

Suppliers shall minimise risks to public community health and safety, especially in infrastructure and equipment design and operation.

Suppliers shall ensure that products and services supplied to the Company are safe for use and consumption and comply with applicable legislation, industry standards and international quality and safety standards. Suppliers shall implement procedures to prevent contamination and ensure food safety throughout the supply chain.

Suppliers engaged in transportation activities shall implement road safety management systems and maintain vehicles in proper technical condition.

6.2. Responsible Sourcing and Traceability

Suppliers shall ensure an adequate level of traceability of products, raw materials and inputs throughout the supply chain.

Soybean suppliers must comply with ISCC EU certification requirements, including no-deforestation, protection of high biodiversity land, and traceability of raw material origin.

Suppliers must avoid sourcing from areas associated with illegal land use or human rights abuses or other unlawful practices.

6.3. Animal Welfare

Suppliers engaged in cattle farming and milk production must adhere to recognised animal welfare standards, ensuring humane treatment, adequate food, water, shelter, veterinary care and avoidance of unnecessary stress.

Any form of cruelty, violence, abuse or negligent treatment of animals is unacceptable and strictly prohibited.

The Company believes that adherence to the above principles will support the establishment, development and maintenance of business partnerships based on mutual benefit and responsible cooperation.

In case of serious, material and/or systematic violations of this Code, or if suppliers otherwise demonstrate improper conduct, the Company reserves the right to terminate any business relationship and the corresponding contractual arrangements with such suppliers.

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7. COMPLIANCE WITH THE CODE, MONITORING AND SHARED RESPONSIBILITY

7.1. Acknowledgement of Responsibility

Suppliers shall promptly notify the Company of any known or reasonably suspected non-compliance with the requirements set out in this Code.

The Company reserves the right to conduct reviews, audits or inspections to verify compliance with this Code, either independently or with the involvement of qualified third-party experts.

During such reviews, audits or inspections, suppliers shall fully cooperate, provide access to relevant information and documentation in accordance with applicable legislation and implement corrective actions within agreed timeframes where violations are identified.

7.2. Response to Violations and Responsibility

Suppliers acknowledge that non-compliance with this Code may result in legal consequences, financial or reputational risks, or harm to the Company.

In case of violations of this Code, including gross, material or systematic breaches, the Company reserves the right to assess such violations considering their nature and impact and to make decisions regarding further cooperation with the supplier, including restriction, suspension or termination of business relationships.

7.3. Continuous Improvement

Suppliers shall continuously improve their activities and processes in line with the requirements of this Code and shall immediately notify the Company of any violations of this Code or unethical behaviour.

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8. FINAL PROVISIONS

8.1. The Company considers compliance with this Code to be the foundation for long-term, responsible and mutually beneficial partnerships and for establishing a responsible and sustainable supply chain based on trust, integrity, respect for human rights and compliance with the law.

8.2. Current corporate policies and information on the Company's approaches to ethics, compliance, sustainability, human rights and stakeholder engagement are published on the Company's official website: <https://astartaholding.com/>.

8.3. The Company reserves the right to review and update this Code and other policies without prior notice to suppliers, ensuring their continued relevance and alignment with international best practices.