

oben Group

OBEN POLAND

CODE OF ETHICS AND CONDUCT

CORP-GH-POL-001





CONTENT

1. A MESSAGE FROM OUR EXECUTIVE PRESIDENT 3

2. A CODE BASED ON VALUES 5

3. EVERYBODY'S RESPONSIBILITY 11

4. THESE ARE OUR COMMITMENTS 13

5. ADMINISTRATION OF THE CODE 23



1. MESSAGE FROM OUR EXECUTIVE PRESIDENT



Dear colleagues:

In the Oben Group family, we have always been characterized by our duty to our values.
Our daily actions define and highlight the company's personality, for each one of us and for our families. This is why we have a duty to reflect our corporate values through exemplary conduct and ethical behavior at all times; and remember that we are bound to reinforce such values every day, to ensure its endurance.

This Code of Ethics and Conduct defines our collective personality: an ongoing sense of duty and responsibility designed to maintain the corporate values of our company. Meeting such standards involves more than simply reading this document: such a culture must be lived and promoted everyday; at work, in our homes, and among our family members.

I invite you to give life to these guidelines by striving to transform them into habits. Such is the best tool we have in the task of working towards our objectives every year, while maintaining our character intact. This is a guide committing us to our corporate values, our culture of doing the right thing.

At Oben, we are committed to what we do, and what we do we do well. I am counting on your valuable support and commitment to our shared goals.

Thank you very much,

Yamal Zaidán



2. A CODE BASED ON VALUES

Our code is based on our corporate values, which reflect the behavior expected from all those who work with Oben Poland. This code is the vital ingredient for a full compliance with our Purpose and Principles.

3.1 PURPOSE

Sustainable solutions to drive food safely to the world.

3.2 PRINCIPLES



Efficiency, our essence

- At the core of everything we do is a focus on efifciency.
- We strive for excellence in every detail, ensuring that our work and products consistently meet the highest standards.
- We do more with less, maximizing efficiency of time and resources.



Stronger together

- We believe that coming together and joining our efforts for synergies is key to achieve our goals.
- By collaborating, we complement and challenge each other to give our best and always stay at the top.
- Together, we can accomplish more than we could individually.



We innovate smart

- We are constantly seeking ways to improve and turn our ideas into extraordinary results
- We embrace innovation and use it to drive progress and succeed in an ever-changing world.
- For us there is nothing impossible.



We believe in sustainable sustainability

- We take our responsibility to protect present and future generations seriously.
- We use the fewest resources possible to reach more people and make a positive impact on the world.



Exceptional service, every time

- We act with agility and reliability, always ready to adapt and meet the needs of our external & internal customers.
- Whether it's through fast response times or flexible solutions, we are dedicated to delivering excellence.
- Exceptional service is a top priority.

3.3 CORPORATE VALUES

At Oben Poland we value:



Excellence



Passion



Dynamism



Commitment



Safety

3.3.1. SAFETY:

We prioritize the wellbeing of our collaborators, because they are our most important asset.

- We instill in our collaborators a culture of prevention.
- We fully comply with established safety guidelines.
- We identify risk situations and we correct unsafe acts by teaching and reporting.
- We propose ongoing improvements that minimize risks in the workplace.
- By working in a safe environment, we produce to a higher standard, transmitting confidence to our customers.

3.3.2. COMMITMENT:

We are always careful to remain a team dedicated to surpassing our goals and exceeding the expectations of our customers

- We overcome difficulties through our perseverance.
- Our knowledge is complemented by the experience and knowledge of other team members.
- We cooperate in order to achieve and exceed our objectives.
- We provide our customers with a range of alternative solutions, as part of our commitment to their satisfaction.

3.3.3. EXCELLENCE:

We seek constant improvement through learning, efficiency and innovation.

- We analyze our processes in order to improve them.
- We recognize that we have things to learn.
- We seek to generate savings in costs, time, and resources.
- We work in an orderly, clean and safe manner.
- Our customers always receive a quality service.

3.3.4. DYNAMISM:

We evolve in a proactive manner in order to adapt to changes in the environment.

- We seek new ways of doing things.
- We do our best to be one step ahead.
- We respond quickly and positively to changes.
- We seek out best practices within the market in order to implement them.
- Our customers receive an immediate reply; we are quick and precise when providing information.

3.3.5. PASSION:

We act with joy, optimism, perseverance and lots of energy.

- We like what we do and always enjoy doing it with a smile.
- We are coherent in what we say and do, we take on challenges enthusiastically and willingly.
- For us, the only approach is “Yes we can”; we look to the future with enthusiasm.
- Each one of our customers isunique and special; their priorities are our priorities.


SOLUCIONES
SOSTENIBLES
PARA
LLEVAR
ALIMENTOS
SEGUROS
AL MUNDO


PREPÁRENSE PARA
SER PARTE
SOLUCIONES
SOSTENIBLES
PARA
LLEVAR
ALIMENTOS
SEGUROS
AL MUNDO


SOLUCIONES
SOSTENIBLES
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SEGUROS
AL MUNDO


ZRÓWNOWAŻONE ROZWIĄZANIA,
KTÓRE BEZPIECZNIE DOSTARCZAJĄ
ŻYWNOŚĆ NA CAŁY ŚWIAT


SOSTENIBLES
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oben Holding Group
SOLUCIONES
SOSTENIBLES
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3. EVERYBODY'S RESPONSABILITY

Our Code constitutes a public declaration through which Oben Poland states its commitment to doing the right thing. It is a highly valuable resource which contributes to collaborators and other persons making well-founded and ethical decisions.

Our Code includes references to in-house requirements of Oben Poland, including policies and procedures. Naturally, no code of conduct can cover every possible situation; therefore, we trust that individuals will use their good judgment and speak out clearly whenever a question or concern arises.

The fact that we operate in more than 17 countries means that occasions may arise in which local laws, regulations or customs might enter into conflict with our Code. In the event that a conflict or difference arises between our Code and applicable legal requirements, the law must always take precedence.

4.1 WHO MUST ADHERE TO OUR CODE?

4.1.1 THE ENTIRE OBEN GROUP

Our Code is applicable to Oben Poland collaborators, including the Senior Management and the members of the Board of the Oben Group.

4.1.2 OUR CUSTOMERS AND SUPPLIERS

Our customers and suppliers include partner companies and third parties, and they can directly affect our reputation through their own behavior. That is why we wish to work together with clients and suppliers and share our commitment to safety, ethics and compliance. In this regard, we expect and encourage all our contractors and their employees to act in accordance with our Code. If we consider that they have not complied with our expectations or with their obligations, we will take appropriate measures to ensure their compliance.

4.2 RESPONSIBILITIES OF ALL OUR COLLABORATORS

It is the responsibility of all Oben Poland collaborators to:

- Read all the information described in our Code and to act in accordance with the established principles.
- Act in a safe, ethical manner, in accordance with applicable laws and regulations, in-house requirements, values and behavior, and in keeping with our objectives.
- Ask questions and express your concerns if you become aware of any possible infraction of the law, regulations, our Code, or the requirements of Oben Poland.
- Cooperate fully if required at any time to respond to an investigation or audit.
- Help the members of your team to understand the principles and guidelines of our Code, the requirements of Oben Group and applicable laws.

4.3 SPEAK UP UNRESERVEDLY

Each one of us is responsible for speaking out if we see an unsafe, unethical or potentially damaging situation. If you have any questions, need help, or you would like to express your concerns, you have a number of options available to you, defined in Section 5.2 "Receipt of Complaints".

4.4 ZERO TOLERANCE FOR RETALIATION

At Oben Poland reprisals are not tolerated. We believe that acts of reprisal constitute reproachable conduct. Reprisals may take a number of forms, such as for example threats, intimidation, exclusion, humiliation, and the posing of questions in a malicious manner or in bad faith. If you believe that you or someone you know has suffered reprisals, contact us through the options available, as defined by Section 5.2 "Receipt of Complaints".



4. THESE ARE OUR COMMITMENTS

Below are our commitments, those principles that govern the behavior of Oben Poland:

5.1 OPERATE SAFELY, RESPONSIBLY AND RELIABLY

We know that each one of our collaborators has a family to look after (directly or indirectly), and that their family expects them to come home safely at the end of the day. That is why we concern ourselves with maintaining a safe working environment, providing the tools and equipment needed to ensure the health and safety of our collaborators.

5.1.1 HEALTH AND SAFETY IN THE WORKPLACE

As a collaborator of Oben Poland, you must comply with the following obligations:

- Comply fully with safety procedures and rules (for example, use personal protective equipment, respect safe operating rules and safety notices, etc.), because this is the only way in which we can meet our target of zero accidents.
- Only perform those tasks for which you have been trained.
- Immediately report any accident, incident, illness or unsafe conditions.
- Do not assume that someone else has completed a task.
- Stop any type of work activity (yours or that of another person) if you consider it unsafe.
- Comply with established company safety protocols (for example, wear an identification card and respect inspection of the same when entering the workplace).

5.1.2 INFLUENCE OF ALCOHOL AND DRUGS DURING WORKING HOURS

Under no circumstances will we tolerate the following conduct:

- Reporting for work under the influence of alcoholic drinks and/or illegal drugs.
- Possession or consumption of illegal drugs within or beyond the facilities of the companies within the group.

5.2 MAINTAIN ETHICAL CONDUCT AT ALL TIMES

Our collaborators are the key to the success of Oben Poland, and that is why we cultivate a working environment in which integrity, honesty and transparency prevail in all our actions, 24 hours a day, 365 days a year, because we are aware that we are representatives of Oben Poland and Oben Group at all times.

5.2.1WORKING PRACTICES AND CONDUCT IN THE WORKPLACE

As a collaborator of Oben Poland, you must comply with the following obligations:

- Display integrity, ethics and transparency at all times in the performance of your duties.
- Do not take advantage of another collaborator through manipulation, covering up, undue use of confidential information, false declarations concerning relevant occurrences, or other unfair practices.
- Generate a working environment in which respect and professionalism take precedence.
- Comply with the laws and regulations applicable to your company.
- Arrive punctually at your workplace and do not fail to report to work without proper justification.
- Always wear the complete company uniform when at the workplace.
- Report any failure to comply with this Code.

5.2.2 USE OF THE NAMES OR LOGOS OF OBEN POLAND AND OBEN GROUP

No collaborator should use the names or logos of Oben Poland or of any of the other companies that belong to the group for any purposes beyond those performed in the workplace, such as external work or other activities for personal benefit, or for the benefit of unauthorized third parties.

5.2.3 INAPPRORIATE USE OF ASSETS

All collaborators must safeguard the tangible and intangible assets of Oben Poland. In this regard, collaborators must abide by the following guidelines:

- Use the assets and resources of Oben Poland solely for the purposes for which they are intended, avoiding any personal use or other type of use.
- Do not reveal confidential information, including after leaving the company.
- Do not remove any information referring to Oben Poland upon completion of your working relationship.

5.2.4 CONDUCT IN PRIVATE LIFE

We respect the privacy of our collaborators, and we take an interest in what they do beyond the workplace if it affects the reputation of the legitimate business interests of the group; in this context, collaborators are expected not to involve themselves in illicit, immoral or degrading businesses, or other activities which place in doubt their moral solvency.

5.2.5 CONDUCT IN SOCIAL NETWORKS

As a collaborator of Oben Poland upon completion of your working relationship you are expected to comply with the following obligations:

- Employ appropriate language and conduct in communications with the media or social networks associated with Oben Group or subsidiary companies, providing truthful information at all times.
- Avoid acting on your own account and provoking debates on social networks associated with Oben Group or subsidiary companies, or which are associated with competitors.

5.2.6 CONFLICTS OF INTEREST

At Oben Poland we act honestly and thically, avoiding situations that might involve a conflict between personal interests and those of Poland. In this regard, collaborators are expected to adhere to the following guidelines:

- Do not take decisions or conduct transactions with customers, suppliers or competitors with the intention of generating any personal benefit, directly or indirectly, above what is best for Oben Poland.
- Do not remove any information referring to Oben Poland upon completion of your working relationship.
- Do not use the assets, or the confidential, privileged and strategic information of Oben Poland for personal benefit, directly or indirectly.
- Do not develop other activities which interfere with or enter into conflict with our activities or your duties at Oben Poland.
- Investments must not be made which grant a collaborator management powers with supplier companies, customers or competitors, or with any company which maintains business relations with Oben Poland.

Any conflict of interest must be divulged to the Human Management department for assessment at the time an individual joins the company and at any time during their working relationship with the company.



5.3 RESPECT AND EQUITY

When the respect and cherish is shared among us, we can achieve success both individually and as a company. We all play an important role in keeping a corporate culture based on respect and equity.

5.3.1 DIVERSITY AND INCLUSION / EQUAL OPPORTUNITY

We value having workforce composed by collaborators with different skills, perspectives and opinions, on this regard:

- The decisions regarding hiring and promotions are taken based on merits / performance, individual skills, abilities, training and other factors related to the business.
- If a collaborator's relative wants to be hired, he/she should apply according to the available job opening and must go through the corresponding selection process, in which competencies and experience necessary to fill the vacancy he/she is applying to are evaluated. If a relative is selected, he/she could not take a position managed the collaborator he/she is related to.
- No decision is taken based on discriminatory criteria such as race, color, religion, gender, sexual preference/orientation, nationality, civil status, age or disability, nor in any other condition protected by law or regulations.

5.3.2 WORKING ENVIRONMENT FREE OF HARASSMENT

We do not tolerate any form of harassment or behavior that creates an intimidating, hostile and offensive working environment for the collaborators. Some types of harassment are:

- Sexual harassment, through physical contact or unrequested gestures.
- Inappropriate comments or jokes.
- Offensive and explicit images.
- Abuse or intimidation.
- Harassment at work.

5.4 CONTRIBUTE TO THE SUSTAINABLE DEVELOPMENT OF THE GOVERNMENTS AND COMMUNITIES WITH WHICH WE WORK

Sustainability is the purpose of all initiative and, being aware of that, we look for not only sustainability of the business, but significance with the clear objective of consistently contributing to community development, environmental care and respect for human rights.

5.4.1 ENVIRONMENT

We are committed to conducting business in such a way that the environment is protected, natural resources are preserved and sustainable development is guaranteed. In that regard, we hope that each of our collaborators serves in an environmentally responsible way, according to the policies set forth for such objective.

5.4.2 COMMUNITY

We contribute in different ways to the development of communities, not only the nearby ones, through the support of different organizations seeking to generate comprehensive development and social promotion of people in distressed areas.

5.4.3 HUMAN RIGHTS

We work hard to conduct our business in such a way human rights and people dignity is respected, in that sense:

- We provide a working environment and conditions ensuring the corresponding compliance of the functions of each collaborator.
- We are against human rights abuse, such as child labor, human trafficking and forced labor.
- We expect our collaborator to report any abuse of human rights in our operations or within our commercial partners.

5.5 WORK WITH CLIENTS AND SUPPLIERS IN AN HONEST, RESPECTFUL AND RESPONSIBLE WAY

We treat our clients and suppliers fairly, encouraging free competition among suppliers and equal treatment among all our clients.



5.5.1 CLIENTS

Our clients are very important to us, in that regard, we are committed to:

- Always treating the client in a polite way.
- Providing accurate information that is appropriate and suitable to the clients' demands and rights.
- Not keeping commercial relationships with clients participating in illegal business.

5.5.2 SUPPLIERS

We engage in commercial relationships with our suppliers in a responsible way, based on honesty, respect and ethics. In that regard, we are committed to:

- Working with suppliers who act according to the principles set forth in this Code in the activities related to Oben Poland.
- Negotiating in an honest and fair way with our suppliers, without discrimination and/or impositions.
- Respecting our suppliers, paying them on time for their services.

5.5.3 UNFAIR COMPETITION

We are committed to compete in the market under a context of integrity and respect with our competitors. In that sense, the collaborators of Oben Poland must:

- Comply with the current laws and regulations on fair competition of the countries we participate.
- Exhibit a professional attitude, based on the principles and values of Oben Poland, in all engagement with the competitor and the regulators.
- Not participate in any agreement which intends to limit the free competition in the market we operate.

5.5.4 TRUSTWORTHINESS OF OUR PRODUCTS

We value the trust that our clients invest in us. In that regard, in Oben Poland, we are committed to:

- Elaborating products of high quality that meet our clients' needs.
- Increasing our quality standards to more demanding levels. In compliance with the necessary certifications, we improve our management systems and make regular audits.
- Complying with good manufacturing practices (GMP) and hygiene.



5.6 BE HONEST AND TRANSPARENT IN OUR OPERATIONS AND RESULTS

We all contribute in the recording process of financial and non-financial information of Oben Poland. In that sense, apart from protecting our interests, we must also exhibit an open and honest attitude regarding our business and results.

5.6.1 ACCURATE AND COMPLETE INFORMATION RECORDING

The business partners, the government officials and the public trust that our business disclosures and registrations are accurate and complete. Such information is also essential within Oben Poland so that we can take appropriate decisions. In that regard, we are committed to:

- Guaranteeing that all transactions are duly authorized, recorded and timely declared, as required.
- Complying with the applicable laws and with the requirements of Oben Poland when documents are created, kept, retained or destroyed, including those in electronic format.
- Ensuring that all necessary approvals are in place when an answer is given to an information request made by a governmental or regulatory body.

5.6.2 CONFIDENTIAL INFORMATION USE

Confidential information is information you become aware of during the performance of your functions, information related to the brand of Oben Poland and/or information regarding its personnel, current and future clients, suppliers and shareholders. As collaborator, you must comply with the following obligations:

- Not to disclose confidential information to unauthorized third parties unless it is part of your work functions and you receive explicit authorization to do son.
- Not to disclose information related to clients to any person who is not part of Oben Poland.
- To require approval of the General Management to respond information requests considered as unusual made by regulatory, supervisory and governmental entities.
- To ensure the adequate preservation of documentation and information managed by you during the performance of your functions, applying to that end the policies and standards of security and protection of information set forth by Oben Poland.
- To comply with the current regulation regarding the security and protection of the personal information of clients and collaborators.





- Travel and accommodation expenses and/or personal expenses for executives or officials from other entities may be covered when their presence is required at a business activity or institutional event.
- Care must be taken to ensure that gifts bearing the logo of Oben Poland or subsidiaries are socially and legally permissible within the jurisdiction in which they are given.
- No cash gifts may be offered.
- Care must be taken to ensure that all expenses associated with gifts are recorded correctly, and that the true purpose of such expenses is reflected.

5.7 FIGHT AGAINST CORRUPTION, BRIBERY AND MONEY LAUNDERING

At Oben Poland we strongly oppose corruption, bribery and money laundering. In this regard, we comply with domestic legislation against these challenges within the countries or markets in which we opeate. In alignment with this aim, we have established a series of guidelines designed to minimize the risks associated with these issues.

5.7.1 REGARDING THE SERVICES AND GIFTS WE BESTOW

- The lunches, gifts, trips and other services we bestow upon customers, suppliers and other third parties are permitted as long as they involve legitimate business activity and they are within the framework of approval limits.
- Expenses associated with lunches and other services for interest groups in order to maintain relations are permitted as long as the sums involved are within the framework for approval limits.

5.7.2 CONSIDERATIONS FOR THE TREATMENT OF PUBLIC OFFICIALS

- The decisions of the public sector should not be influenced, directly or indirectly, by granting or proposing the granting of personal benefits to public officials.
- When a company of the Oben Group wishes to hire a public official (current or who has been an official in the last two years) or a direct family member, Human Resources Management must make the necessary efforts to ensure that the recruitment does not contravene legal provisions.

5.7.3 REGARDING THE SERVICES AND GIFTS WE RECEIVE

- Employees must avoid accepting services or gifts from third parties; if this is not possible, these must maintain a direct relationship, proportionality and appropriateness, in order to ensure maintenance of a transparent relationship.
- If it becomes necessary to accept a service or gift considered significant (and which generates a conflict of interest in the employee), this must be communicated to and validated by the General Management through the process established by the organization

5.7.4 DONATIONS

Oben Poland can only make donations to institutions, under no circumstances will donations be made or offered to the representatives of institutions. Also, every donation must be accompanied by the corresponding donation certificate.

5.7.5 CONTRACTING OF SUPPLIERS, AGENTS AND THIRD PARTIES

Prior to the selection of any supplier, agent and/or third party who may negotiate on behalf of or in favor of any Oben Group, you should consider:

- Carrying out the selection with due diligence, evaluating the reputation and integrity of the party involved.
- That participation with suppliers, agents and third parties is covered by a prior written agreement.
- That the written accord includes contractual agreements, so that the party involved expressly agrees to abide by the central tenets of the anti- corruption, bribery and money laundering guidelines maintained by Oben Poland and Oben Group.

5.7.6 AGAINST MONEY LAUNDERING AND THE FINANCING OF TERRORISM

All collaborators Oben Poland must be committed to the pursuit of their activities within a framework of security, legality, and the guarantee of transparency, in a manner which prevents the entry of illegal monies for the purpose of legitimization.







5. ADMINISTRATION OF THE CODE

Our Code is public; we therefore encourage all collaborators to share it with their peers and to form part of its dissemination, in order to create a broader understanding of its content.

6.1 REGARDING THE DELIVERY OF THE CODE AND CONFIRMATION OF ITS RECEIPT

6.1.1 REGARDING THE DELIVERY OF THE CODE AND CONFIRMATION OF ITS RECEIPT

All current and future collaborators of Oben Poland will have access to a copy of this Code through their direct Supervisor or Manager, and they will be responsible for reading it and confirming that it has been read and understood through submission of the form "Commitment to Compliance with the Code", which must be duly signed.

6.1.2 REGARDING DISSEMINATION OF THE CODE

This Code will be published on the intranet and other in-house media of Oben Poland.

6.2 RECEIPT OF COMPLAINTS

All collaborators at all levels will maintain an "open door" policy regarding queries concerning this Code and its applicability.

We expect all collaborators to present their queries regarding any specific situation, no matter how small and insignificant it may seem.

Each collaborator must remain alert to any work-related activity which might be interpreted as an infraction of this Code. If you have knowledge of or suspect a violation of this Code, your obligation is to report it immediately. Your statement may be oral or in writing, and if you prefer, it can be made anonymously. Several options are available when making a statement.

- Explain your concerns to your Oben Poland direct Supervisor or Manager.
- Explain your concerns to the Oben Poland Human Resources Manager.
- Explain your concerns to an Oben Group In-House Director.
- Explain your concerns anonymously through the channels of the Corporate Ethics Line (shown at the end of this document).

6.3 SANCTIONS APPLICABLE TO NON-COMPLIANCE WITH THE CODE

Any collaborator with the companies within the Group who violates this Code may be subject to civil and/or criminal action, as well as sanctions levied by their respective employer. It is important to note that all collaborators of the Group's companies will be subject to disciplinary measures defined by the organization which employs them, in accordance with local regulations and applicable policies, and that such disciplinary measures may include dismissal.

More information is available in the "In-House Work Regulations" of the respective employers.

6.4 UPDATING OF THE CODE

Updated versions of the Code will be redistributed to all collaborators, and the activities outlined in section 5.1 "Delivery and Dissemination of the Code" will be initiated.

oben Group

OBEN POLAND

CORPORATE ETHICS LINE

Through these contact channels, you can report violations of the Ethics and Conduct Code, corporate policies and procedures in a secure, anonymous and confidential manner.

Web: https://ethosone.net/complaint/oben

Correo: oben@ethosone.net

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