

Code of Conduct for the company group, employees and business partners

Preamble

As the largest manufacturer of ammonia and urea in Germany, SKW Stickstoffwerke Piesteritz GmbH is an important economic factor and employer in the region of Wittenberg. AGROFERT Deutschland GmbH is a subsidiary of SKW Stickstoffwerke Piesteritz GmbH and bundles all German activities of AGROFERT, a.s. under one roof. As one of the leading providers of operating resources in agriculture and industry, we offer a wide range of services for agriculture. As a traditional company we are deep-rooted in the region. The SKW Piesteritz Group (hereinafter referred to as "SKW Piesteritz") is committed to ecologically and socially responsible corporate management, which we manifested in our sustainable corporate goals that are deduced from the solidarity with the people who live here. We expect from our employees to observe and practice the principles of ecological, social and ethical behaviour. We expect the same from our business partners, who make a significant contribution to the further development of our sustainable supply chain.

The code of conduct defines the most important principles and rules governing our actions and is part of the integrated management system. The following requirements explain the expectations of SKW Piesteritz regarding the attitude and behaviour of our employees and business partners as well as their suppliers in their business activities. The supplier also confirms compliance in his supply chain with the following requirements. If the contracting parties have drawn up their own codes of conduct, both parties recognise their codes as having equal status and neither submits contractually to the other party's code of conduct. To ensure compliance with our behavioral requirements, SKW Piesteritz reserves the right to carry out audits and assessments. Furthermore, we will consistently terminate business relationships if no corrective measures are carried out in the event of violations of the named principles or repeated violations occur.

The Board of Directors of

SKW Stickstoffwerke Piesteritz GmbH

and

AGROFERT Deutschland GmbH

Note:

In order to increase readability no gender-neutral differentiation is made in the text. Corresponding terms generally apply to all genders in terms of equal treatment. This language is solely used for editorial purposes and entirely without prejudice.

General Demands on Conduct

Lawful and responsible conduct

The success of the company can only be achieved by legitimate and responsible conduct in daily business operations. The employees and business partners of SKW Piesteritz comply with all applicable laws and instructions regarding their workplace environment as well as in-house rules and regulations. We rely on all our employees that their personal interests do not conflict with the interest of the company.

Protection of company property

Company property may only be used for company purposes. The employees and business partner must protect the company property from loss, theft, damage or vandalism. Company property includes facilities, buildings, vehicles, IT systems, passwords, confidential information, funds and equipment such as IT supplies and office supplies. Company knowledge and intellectual property must be protected and the intellectual property of others must be respected.

Basic principles of reporting

Reporting has to be carried out according to the basic principles of completeness, correctness and compliance. Business transactions are reported consistent with external and internal regulations. They give stakeholders an accurate, timely picture of our business performance and the relevant facts. SKW Piesteritz is aware of its social position and inherent responsibility to fulfil its tax obligations. On maintaining a professional and co-operative relationship with local tax authorities, the company avoids culpable reductions of fiscal obligations or violations of obligations to cooperate with authorities.

Social Requirements

Prohibition of discrimination

According to the democratic principle, no one shall be discriminated based on their ethnic origin, skin colour, sex, age, disability, religion or beliefs, sexual orientation or any other characteristics or political attitude. All employees and business partners are obliged to act respectfully and refrain from any form of discrimination (e.g. disadvantaging behaviour, harassment, bullying).

Human Rights

SKW Piesteritz and our business partners are obliged to respect internationally and nationally recognized human rights. These include in particular the international charter of human rights, the ten principles of the UN Global Compact and the labour and social standards of the International Labour Organization (ILO). Human rights and human dignity must remain intact through business activities. Everyone must be capable of holding rights everywhere in order to bear rights and obligations.

Child Labour and Forced Labour

Child labour is rejected and the relevant minimum age for admission to employment in accordance with state regulations is observed. There is no tolerance for the exploitation of children and young people.

Forced and compulsory labour as well as any form of modern slavery and human trafficking are rejected. Involuntary labour or forced labour under threat of punishment does not correspond to the image of the company.

Freedom of Association

The freedom of association and the right to collective bargaining are respected. All employees of the company and business partners have the right to form employee representatives and trade unions. It must be ensured that this right is not impaired.

Working hours and Remuneration

SKW Piesteritz commits itself and its business partners to fair payment and to comply with the applicable working hours in accordance with statutory regulations. Our business partners guarantee that the working hours correspond to the respective national legal requirements or the minimum standards of the respective national economic sectors.

Environment, Safety and Healthcare

Environmental protection

We acknowledge our special responsibility as a company and the business activities of our business partners on the environment. Protecting the environment and conserving its resources are high-priority company goals. Due to an integrated Quality Management System we are able to maintain high-level environmental protection standards which in many areas go beyond legal requirements. We take part in the European Eco-Management and Audit Scheme (EMAS), are committed to the Responsible Care initiative and comply with the European Chemicals Regulation REACH. From the development stage of our products to their production and use – our goal is to use energy and resources efficiently, minimising emissions as much as possible.

We are constantly working on improving our production technology, minimising fuel and water consumption, reducing greenhouse gas emissions and avoiding the use of hazardous materials to the greatest degree possible. All our employees and business partners are obliged to use resources and energy economically and efficiently and to make sure that their activities have the smallest possible environmental impact. All applicable environmental protection laws and regulations shall be strictly observed.

Health and safety at work

We act and make decisions according to the principle: "Safety first". SKW Piesteritz guarantees health and safety at work within the scope of national regulations and supports the continuous development and improvement of working conditions and workplace safety to reduce risks and ensure the best possible provisions against accidents and vocational diseases. We maintain a health management system,

which includes regular, mandatory and comprehensive review and evaluation of process sequences, workplace requirements and risk assessments. Our employees and business partners are obliged to comply with our internal regulations for health and safety at work as well as accident prevention unconditionally, to highlight potential risks and to take part in regular training courses and instructions. Through comprehensive medical surveillance we ensure that only individuals who meet specific health requirements work at our production sites. The employees will be provided with the protective equipment necessary for their work and will be required to use it.

Product Safety

The safety and conformity of the products is important for people and the environment. Therefore, national and international regulations and standards for protection are complied with. The quality of products contributes to safety. In addition, all products and services contain the contractually defined safety and quality criteria upon delivery. The use must be done safely.

Quality Assurance

SKW Piesteritz and its business partners work according to the highest quality principles in development and production and in accordance with legal requirements and technical regulations.

Respectful Treatment

Respectful and fair treatment of colleagues and employees

Respect and mutual appreciation concerning the interaction are basic principles of a constructive and successful co-operation. All employees and business partners are committed to pursuing the principle of contributing to a constructive and successful cooperation, especially in relation to respecting the personality and dignity of other colleagues and employees. The employees conduct themselves according to these basic principles at all times.

Business conduct towards affiliates and competitors

Our conduct towards affiliates is characterised by trust, fairness and a high degree of independence in corporate decisions. Our commercial decisions must not be influenced by special interest or personal gain. We are committed to fair dealings with our business partners and competitors and do not make improper use of existing room for manoeuvre. We do not disseminate false information about products or services of our competitors or otherwise we try to gain competitive advantage on a basis of an unfair business conduct. Antitrust and competition law is observed.

Business relationships with suppliers

We maintain trustworthy and fair business relationships with our suppliers. In turn, we expect our business partners to work with us with the same degree of respect and integrity. Our purchase department is acting in accordance with the applicable laws as well as internal regulations and is responsible for purchasing materials and subcontractor services on good terms. Not involving the purchase department can

cause disadvantages for SKW Piesteritz. Therefore, all purchasing processes need to be done by this department. Suppliers are selected solely on a competitive basis regarding to pricing, quality, performance and suitability of the products and services offered.

Complaint Management and Whistleblowing

Information, hints, claims or complaints from employees, business partners, former employees or other interested parties are processed quickly and fairly in accordance with the applicable laws and regulations. Violation of the code of conduct can lead to disciplinary measures under labour law and national criminal proceedings. In case of doubts, grievances or mistakes, the manager can be contacted at any time. Notifications and violations must be reported. Different reporting channels are provided for this.

Avoiding Conflict of Interest

Bribery and Corruption

We do not tolerate any form of corruption or bribery. Our employees and business partners do not abuse the company's contractual business connections for personal gain or for the benefit of third parties, nor may such connections or contacts be pursued at the expense of the company. Our employees must not allow themselves to become influenced in business decisions through unjustified advantages from suppliers or customers or members of the public service, neither offer nor grant unjustified advantages in conjunction with their professional activities. Our employees do not influence business partners or members of the public service.

Handling of gifts, gratuities and other benefits

Gifts, gratuities and other benefits are common in business relationships to a certain extent. However, those benefits can bear potential for conflict of interest. That is why SKW Piesteritz has implemented a separate binding agreement for dealing with gifts, gratuities and other benefits from customers, suppliers and other contracting partners.

Granting of Gifts, Gratuities and other Benefits

The granting of gifts and other benefits or invitations to events without prevailing business character (entertainment) are to a certain extent in line with usual business practices and a legitimate means to establish as well as to maintain a business relationship. However, they may not exceed the scope of normal business practice or be capable of triggering a potential conflict of interest with the recipient. The granting of gifts, gratuities and other benefits to civil servants or public servants with the aim of obtaining orders or other unlawful business opportunities for SKW Piesteritz or other persons is not allowed.

Regulations on Donations

We and where applicable our business partners make monetary donations and donations in kind to support education, culture, social affairs and sport. We do not make donations in order to gain business opportunities. Donations may only be made within the applicable legal framework as well as internal regulations. The recipient and the purpose must be

documented for all donations. Donations to individual persons, private accounts and persons or organisations which are contrary to our interest or could cause damage to the reputation of SKW Piesteritz are not permitted.

Regulations on Sideline

Before taking up a sideline job, human resources must be informed in writing. Permission for sideline may be denied if it leads to a negative impact on work performance, contradicts the employee's duties within the company, or threatens to provoke a conflict of interest. The involvement of employees in non-profit organisations, such as associations or citizens' initiatives, is permissible and welcomed. However, such involvement shall not conflict with overriding interests of the employer.

Decision Rules

Decisions have legal and economic importance. Wrong decisions must be avoided and possibilities of misuse ruled out. A risk assessment is helpful in making a decision. Doubts and mistakes should be addressed openly and advice should be sought from the manager or the responsible specialist department. No one should be convicted of an opinion, error, act or omission - the presumption of innocence applies. New solutions can be innovatively developed through knowledge, experience, an open exchange of ideas and sometimes also mistakes.

Foreign Trade Law and Economic Sanctions

SKW Piesteritz and our business partners observe all applicable trade control, foreign trade, customs and sanctions

regulations. National and international laws are met. We declare imports and exports properly and comply with all requirements of labeling, documentation and approvals.

Handling of Information

Data Protection

The protection of company data as well as personal data of employees, customers, suppliers and the compliance with applicable data protection legislation are an integral part of our internal regulations as well as of our business partners. We protect data using all possible and appropriate technical and organisational measures against unauthorised access, processing, loss or destruction. An independent internal monitoring body controls the compliance with data protection regulations.

Confidentiality

Our employees and business partners maintain confidentiality regarding the company's internal affairs that have not yet been published. This includes information concerning the organisation of the company and its facilities as well as details relating to business, production, research and internal reporting figures. The obligation to observe confidentiality continues to apply after termination of employment.