AGROINVEST SA

www.agroinvest.gr

SUPPLIER CODE OF CONDUCT

Applicable to all suppliers of goods and services

Version 3.0 | November 2026

1. Introduction

Agroinvest SA (hereinafter 'Agroinvest' or 'the Company') is a Greek company engaged in the production, processing, and trading of agricultural and aquaculture products. Agroinvest is committed to conducting its business responsibly and sustainably, and expects all entities in its supply chain to share and uphold these values.

This Supplier Code of Conduct ('the Code') sets out the minimum standards that Agroinvest requires of its suppliers, contractors, agents, and service providers ('Suppliers'). It reflects Agroinvest's commitments under international certification schemes including Proterra and ASC (Aquaculture Stewardship Council), as well as applicable Greek, European Union, and international laws and regulations.

By entering into a business relationship with Agroinvest, all Suppliers acknowledge and agree to comply with this Code. Agroinvest reserves the right to verify compliance and to take appropriate action, including termination of contracts, in the event of non-compliance.

2. Scope of Application

This Code applies to all Suppliers providing goods, raw materials, ingredients, feed, packaging, services or any other inputs to Agroinvest SA, regardless of their size, location or the nature of their relationship with the Company.

Suppliers are also expected to encourage and, where feasible, require their own sub-suppliers and subcontractors to adhere to equivalent standards. Agroinvest may request evidence of such requirements at any time.

Ingredient manufacturers shall communicate an equivalent set of requirements, with the same intention as this Supplier Code of Conduct, to their own suppliers, including manufacturers of purchased feed materials. Ingredient manufacturers shall retain documented evidence of this communication and provide it to Agroinvest upon request.

3. Legal Compliance

Suppliers must at all times comply with all applicable laws, regulations and administrative requirements in the countries in which they operate. This includes but is not limited to:

- Environmental legislation (EU and national)
- Food safety and product quality regulations (EU Regulation 178/2002 and related legislation)
- Employment and labour law
- Health and safety legislation
- Anti-corruption and anti-bribery laws
- Data protection regulations (GDPR)

In cases where this Code sets a higher standard than applicable law, Suppliers are expected to meet the standard set by the Code.

4. Environmental Responsibility

4.1 General Principles

Agroinvest is committed to minimising the environmental impact of its supply chain. Suppliers are expected to operate in an environmentally responsible manner and to continuously seek improvements in environmental performance.

Suppliers shall:
• Comply with all applicable environmental laws and regulations
• Hold all required environmental permits and licences
• Actively work to reduce greenhouse gas emissions, energy consumption, water use, and waste generation
• Implement measures to prevent pollution of air, water, and soil, including responsible management and treatment of wastewater and effluents
• Avoid the use of substances harmful to the environment wherever alternatives exist
• Report and remediate any environmental incidents promptly

4.2 Sustainable Sourcing (Proterra Alignment)

In alignment with Proterra certification requirements, Suppliers of agricultural raw materials and feed ingredients shall:

- Source materials from farms and operations that are not contributing to deforestation or conversion of natural ecosystems
- Be able to demonstrate the origin of raw materials and provide traceability documentation upon request
- Avoid sourcing from areas with known high conservation value (HCV) or high carbon stock (HCS) without appropriate mitigation

- Implement and document responsible use of pesticides, fertilisers, and other agrochemicals
- Support biodiversity conservation in and around production areas

4.3 Aquaculture Standards (ASC Alignment)

Suppliers providing inputs to Agroinvest's aquaculture operations, including feed, chemicals, equipment and services, shall:

- Support responsible aquaculture practices that minimise environmental impact on surrounding ecosystems
- Not supply prohibited substances or chemicals listed under ASC standards
- Maintain documentation demonstrating compliance with ASC feed and input requirements
- Support traceability and chain-of-custody requirements as specified by ASC certification bodies
- For each feed product supplied, provide Agroinvest with verifiable and supporting documentation declaring whether the product contains more than 0.9% Genetically Modified Organisms (GMO) or macro ingredients produced from GMO.
- For each feed product supplied, disclose to Agroinvest the active compound and inclusion level (in mg or g/kg of product) of any added antibiotic or other medicinal feed additive, and the inclusion level of any antimicrobial classified by the World Health Organization as a Critically Important Antimicrobial for Human Medicine

5. Social Standards and Labour Rights

5.1 Freely Chosen Employment

All labour must be freely chosen. Suppliers shall not use forced, compulsory, trafficked, or bonded labour of any kind. Workers must be free to leave employment upon reasonable notice and must not be required to lodge deposits or identity documents with their employer.

Suppliers shall ensure that employment relationships are voluntary and compliant with applicable national labour laws.

5.2 Child Labour

Suppliers shall not employ children below the minimum legal working age in their country of operation, and in any case not below 15 years of age (or 14 years where permitted by ILO Convention 138). Young workers (under 18 years) shall not be employed in hazardous conditions or night work.

5.3 Non-Discrimination and Equal Opportunity

Suppliers shall not discriminate in hiring, remuneration, access to training, promotion, or termination on grounds of gender, age, race, nationality, religion, disability, sexual orientation, political affiliation, or any other protected characteristic. All workers shall be treated with dignity and respect.

Suppliers shall maintain a workplace free from harassment, abuse, intimidation, inhumane treatment, or any form of physical, verbal, sexual, or psychological misconduct.

Suppliers shall ensure equal treatment of all applicants for employment and all employees in disciplinary practices, job assignment, pay and benefits, promotion and other career opportunities, recruitment processes and conditions, retirement, termination, training and working conditions, irrespective of age, caste, colour, disability, ethnicity, gender, legal status, marital status, nationality, parental status, participation in trade unions, political opinion, pregnancy, race, religion or sexual orientation.

5.4 Disciplinary Practices

Suppliers shall maintain transparent disciplinary procedures and apply them progressively and objectively, while safeguarding the dignity, health and respect of every employee. Deductions from wages or benefits shall not be used for disciplinary purposes. Corporal punishment, mental or physical coercion, verbal abuse and any cruel, inhuman or degrading treatment are prohibited.

5.5 Freedom of Association

Suppliers shall respect the right of workers to freedom of association and collective bargaining in accordance with applicable law and ILO conventions. Where such rights are restricted by law, Suppliers shall enable alternative means for workers to raise concerns.

5.6 Working Hours and Remuneration

- Working hours shall comply with applicable national laws and industry standards
- Wages shall meet at least the applicable legal minimum wage and shall be paid regularly and on time
- Overtime shall be voluntary, compensated at the legally required rate, and shall not exceed legal limits
- Workers shall receive written employment contracts setting out terms and conditions clearly
- Employment terms shall be communicated transparently and in a language understood by workers prior to commencement of employment

5.7 Health and Safety

Suppliers shall provide a safe and healthy working environment for all workers. This includes:

- Conducting regular risk assessments and implementing appropriate control measures
- Providing adequate personal protective equipment (PPE) free of charge
- Ensuring all workers receive appropriate health and safety training
- Ensuring that hazardous or high-risk tasks are performed only by competent, authorized, and appropriately trained personnel
- Maintaining records of workplace accidents and near-misses and taking corrective action
- Ensuring that accommodation provided to workers (where applicable) meets adequate health and safety standards

5.8 Grievance Mechanisms

Suppliers shall establish and maintain effective and accessible grievance mechanisms that allow workers and other affected parties to raise concerns, complaints, or reports of non-compliance without fear of retaliation. These mechanisms must be known to all workers, easy to use, and ensure timely and fair responses.

- Provide workers with clear information about how to access the grievance mechanism, including in their own language where necessary
- Ensure that workers who raise concerns in good faith are protected from any form of retaliation, victimisation, or disciplinary action
- Investigate all grievances promptly, impartially, and confidentially, and communicate outcomes to the parties concerned within a reasonable timeframe
- Maintain records of all grievances received and the corrective actions taken, and make these available to Agroinvest upon request

5.9 Community Engagement

Suppliers are expected to operate as responsible members of the communities in which they work. Positive relationships with local communities contribute to sustainable business operations and are consistent with Agroinvest's broader commitments under Proterra and ASC standards.

- Engage proactively and transparently with local communities that may be affected by their operations, including through regular consultations and information sharing
- Identify, assess, and manage social and environmental impacts of their operations on local communities, and implement mitigation measures where necessary
- Support local employment and, where possible, give preference to local suppliers and service providers, thereby contributing to the economic development of the communities in which they operate
- Avoid actions that undermine local livelihoods, access to natural resources, or cultural heritage, and promptly address any community complaints relating to their operations

5.10 Indigenous People and Land Rights

Agroinvest recognises and respects the rights of indigenous peoples and local communities, including their rights to land, territory, and resources. Suppliers whose operations may affect indigenous communities or involve land use must exercise heightened diligence and act in accordance with internationally recognised standards, including the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and relevant ILO Conventions.

- Obtain Free, Prior and Informed Consent (FPIC) from indigenous peoples and local communities before commencing operations or projects that may affect their lands, territories, resources, or livelihoods
- Respect customary land rights and avoid sourcing from or operating on lands subject to unresolved disputes or claims involving indigenous or local communities
- Not engage in or benefit from the forced displacement of communities or individuals from their lands or territories
- Preserve and respect indigenous cultural heritage, sacred sites, and traditional knowledge in areas affected by their operations

- Provide Agroinvest with documentation demonstrating that land acquisition or use is legally and legitimately established, free from conflict or coercion, upon request

6. Animal Welfare

Where Suppliers are involved in the farming, transport, or processing of animals or fish, they shall comply with applicable animal welfare legislation and industry best practices, including:

- The Five Freedoms of animal welfare (freedom from hunger, discomfort, pain, fear, and freedom to express normal behaviour)
- ASC standards for fish welfare in aquaculture operations
- Humane and stress-minimising slaughter and harvest practices
- Prohibition of the use of antibiotics as growth promoters

7. Food Safety and Product Quality

Suppliers providing food, feed, or food-contact materials shall implement robust food safety management systems. Suppliers are expected to:

- Hold relevant food safety certifications (e.g. FSSC 22000, BRC, IFS, GlobalG.A.P.) or equivalent
- Comply with EU food safety legislation including Regulation (EC) No 178/2002 and related acts
- Maintain full traceability of products and raw materials throughout the supply chain
- Promptly notify Agroinvest of any food safety incidents, recalls, or non-conformities that may affect products supplied
- Implement effective allergen management and labelling procedures

8. Business Ethics and Anti-Corruption

Suppliers shall conduct their business with integrity and in accordance with the highest ethical standards. In particular, Suppliers shall:

- Not offer, pay, solicit, or accept bribes, kickbacks, or any other form of improper payment to any person or organisation
- Not engage in anti-competitive practices, including price-fixing, market allocation, or bid-rigging
- Comply with all applicable anti-money-laundering legislation
- Disclose to Agroinvest any actual or potential conflicts of interest in a timely manner
- Maintain accurate business records and accounts

Suppliers shall have in place their own anti-corruption policies and procedures, and shall take appropriate disciplinary action against any employee found to have engaged in corrupt practices.

9. Traceability and Transparency

Traceability is a fundamental requirement under both Proterra and ASC certification schemes. Suppliers shall:

- Maintain documented systems that enable the tracing of all products and inputs from source to delivery
- Be able to provide, upon request, certificates of origin, chain-of-custody certificates, and supporting documentation
- Inform Agroinvest promptly of any changes in sourcing origins, processing locations, or certification status
- Cooperate fully with any audits or assessments conducted by Agroinvest or its appointed certification bodies
- Ingredient manufacturers shall cooperate and provide complete, accurate, relevant and timely information that enables Agroinvest to conduct Due Diligence on the ingredient manufacturer and on primary raw material production, including supporting evidence on origin, production location, upstream supply chains and applicable social and environmental risk factors

10. Monitoring and Audit

Agroinvest reserves the right to monitor compliance with this Code through:

- Completion of self-assessment questionnaires
- Document reviews and third-party audit reports
- On-site audits conducted by Agroinvest representatives or appointed third parties
- Unannounced inspections where deemed necessary

Suppliers shall cooperate fully with all monitoring activities and shall provide access to relevant records, facilities, and personnel. Any identified non-conformity shall be addressed through an agreed corrective action plan within a specified timeframe.

Repeated or serious non-compliance may result in suspension or termination of the supplier relationship.

Agroinvest shall discontinue purchases from any ingredient manufacturer that does not meet this Supplier Code of Conduct.

11. Reporting Concerns

Agroinvest encourages Suppliers to raise concerns regarding potential breaches of this Code promptly and in good faith. Concerns may be reported to:

Agroinvest SA — Compliance and Sustainability Team

Website: www.agroinvest.gr

Agroinvest is committed to investigating all reported concerns and to ensuring that no individual suffers any detriment as a result of raising a concern in good faith.

12. Review and Updates

This Code will be reviewed at least annually and updated as necessary to reflect changes in applicable law, certification scheme requirements, and best practice. Suppliers will be notified of any material changes. The most current version of this Code is available at www.agroinvest.gr.

Acknowledgement of Receipt and Compliance

By signing below, the Supplier confirms that it has read, understood, and agrees to comply with this Supplier Code of Conduct and to ensure that its employees, sub-suppliers, and agents do the same.

Ingredient manufacturers shall declare whether they meet this Supplier Code of Conduct. For this declaration, 'meets the Code' means that all applicable requirements corresponding to ASC Feed Standard Indicators 2.1.3 and 2.1.4 are fully met, or measures have been implemented to ensure that they will be met.
Ingredient Manufacturer Declaration (select one):

☐ Meets the Supplier Code of Conduct

☐ Does not meet the Supplier Code of Conduct

Company Name:	
Authorised Signatory (Name & Title):	
Signature:	
Date:	

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