



ADAMA

Supplier Code of Conduct

ADAMA Group

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Introduction

ADAMA¹ is a global group conducting business in more than 100 countries worldwide, in a working environment that is challenging due to, amongst others, the differences in culture, customs, and legal systems of each country. Our industry, as part of the food chain industry is subject to constant scrutiny by a wide range of interested organizations as well as the general public, where high standards are expected of us.

ADAMA is committed to doing business with suppliers who like us, adopt high standards of ethics and integrity. This Supplier Code of Conduct outlines our business, social, ethical practices and environmental responsibilities, setting out the standards we expect from suppliers and subcontractors engaged in

business with ADAMA who supply products and/or services to us (“**suppliers**”).

To meet these standards, we all need to take personal responsibility for acting in an ethical and responsible manner with integrity and by understanding what this involves and why it is so important. Our end products are used to help farmers produce food in a time of decreasing natural resources, land and water and energy and preserving or maximizing efficient use of these are cornerstones of our sustainability principles and we want to be able to demonstrate this. As a chosen supplier we may request that you provide us with certificates, participate in assessments or undergo on-site audits to demonstrate your commitment to these principles.

¹ In this Code, the term “ADAMA” or “the Group” means the ADAMA Group and/or a company within the ADAMA Group.



GENERAL

1.1 Objective

This Supplier Code of Conduct aims to strengthen our mutual understanding of how sustainability should be practiced in day to day business. It is designed to provide clear and easily implementable rules of behavior expected of our suppliers, especially in challenging situations or where difficult decisions are involved.

This Supplier Code of Conduct does not constitute a replacement and does not substitute the Law. In any case of conflict between the applicable Law and this Supplier Code of Conduct, the Law shall prevail.

This Supplier Code of Conduct is a supplement to any contract between ADAMA and its suppliers. Where a contract includes more stringent terms than this Supplier Code of Conduct the contract shall prevail.

1.2 The Code's Standing

ADAMA is strongly committed to conducting its business affairs with honesty and integrity, in full compliance with all applicable laws, rules and regulations ("**Law**"). This Supplier Code of Conduct is based on principles of integrity, honesty, credibility, and responsibility. It is designed to integrate with the provisions of the Law, to complement them, and to add to them.

ETHICS

2.1 Business Integrity

Suppliers are expected to comply with all applicable laws and regulations and conduct their business according to high ethical standards and integrity. ADAMA expects that suppliers will not tolerate any form of corruption, bribery, extortion, money laundering or fraud. ADAMA follows the principles of zero tolerance for bribery and corruption with all of its suppliers.

Suppliers shall not grant or offer any personal benefits such as gifts and entertainment to ADAMA employees. Suppliers shall ensure that all activities with public officials or other third parties comply with national laws and international conventions and be conducted with high standards of integrity. Suppliers shall not grant offer or accept, directly or through third parties, bribes or other unlawful incentives (e.g. 'facilitation payments') to or from their business partners or government officials. Anything which is offered or received with the intention of improperly influencing a business decision for or on behalf of ADAMA is considered a bribe.

2.2 Reporting of Concerns

Suppliers shall encourage and provide means for their employees and acting on their behalf to report concerns of unlawful or potentially unlawful activities in the workplace, without the threat of reprisal. Suppliers should investigate such reports in a confidential manner and take corrective actions if and as needed.

2.3 Fair Competition and Fair Marketing Practices

Suppliers shall conduct their business in line with fair competition and comply with all applicable anti-trust/competition laws.

It is expected that accurate and truthful descriptions are used in advertising, sales and marketing practices.

2.4 Trade Compliance

Suppliers shall follow applicable international trade control laws and regulations, including those relating to economic situations, customs requirements and export controls and ensure that they are able to provide relevant information to ADAMA promptly on request.

2.5 Intellectual Property

ADAMA retains ownership of all intellectual property that it creates. Intellectual property rights must be respected and protected and ADAMA's confidential information, customer and employee information must be safeguarded by suppliers and only be used for the purpose for which it was originally provided.

2.6 Data Privacy and Data Protection

Suppliers shall ensure that all personal, confidential and sensitive information is safeguarded and kept in accordance with applicable data privacy standards and contractual requirements. Suppliers shall not transfer, sell or trade personal information.

2.7 Animal Welfare

Suppliers who conduct animal testing or use third parties who conduct such studies shall do so according to high ethical standards and in compliance with the provisions of all applicable legislation concerning the welfare of animals. ADAMA may monitor the provision of these services to ensure these high standards are met.

FAIR LABOR PRACTICES AND HUMAN RIGHTS

3.1 Child Labor Avoidance

ADAMA does not tolerate any form of exploitative child labor practices in our supply chain. Suppliers must avoid any form of child labor in their operations consistent with the International Labor Organization (ILO) core labor standards.

Under proper managerial supervision and only in accordance with applicable law, children aged between 14-18 can participate in summer or vacation work, industrial placements, vocational trainings or internships (but not in hazardous conditions nor during night hours).

3.2 Freely Chosen Employment

ADAMA does not tolerate forced, bonded, nor compulsory labor, in our supply chains. Practices such as the retention of personal property, passports, training certificates or any other document for inappropriate reasons are also not acceptable.

3.3 Freedom of Association and the Right to Collective Agreements

ADAMA respects the right of all people to join or form trade unions of their own choosing and to bargain collectively. In accordance with local laws, suppliers must respect the rights of their employees to associate freely, form and join labor unions, seek representation, join works councils, and engage in collective agreements. Suppliers should also not disadvantage employees who act as workers' representatives and are

expected to be committed to establishing a constructive dialogue with such representatives.

3.4 Fair Employment Conditions

Suppliers shall adopt and adhere to rules and conditions of employment that respect workers, and at a minimum, safeguard their rights under local legal standards, labor and social security laws and regulatory requirements. Working hours should comply with local laws and/or ILO regulations, whichever is more stringent. Suppliers are expected to provide their employees with fair and competitive compensation that ensures an adequate standard of living. Any deductions from wages not provided for by local law are not permitted without the express permission of the individual concerned.

3.5 Equal Opportunity and Fair Treatment

Suppliers shall recognize and respect the provision of equal opportunity and commit to maintaining a workplace that is free from discrimination and harassment. Suppliers are encouraged to value diversity and treat employees with honesty, fairness, dignity and respect. Discrimination is not tolerated in hiring, compensation, access to training, promotion, termination or retirement on any basis, including gender, race, sexual orientation, religion, nationality, age, disability, marital status, union membership, or political affiliation. Every employee should be treated with dignity and respect. Harassment and/or abuse is prohibited in any form including physical, sexual, psychological and verbal.



HEALTH, SAFETY, ENVIRONMENT AND QUALITY

4.1 Occupational Health and Safety

ADAMA is committed to provide a safe working environment and strictly follows all relevant legal provisions in order to protect the health and safety of our people. Suppliers shall have appropriate controls in place to ensure a safe and healthy work environment for all employees, including controls, work procedures and necessary measures to mitigate health and safety risks in the workplace according to the nature of the site's activity.

Suppliers shall have appropriate controls to manage risks to acceptable levels to prevent illness, promote good health and address any changes to the health status of employees. Suppliers should ensure that relevant safety rules and instructions are in place which are designed to safeguard the wellbeing and health of employees and to manage the consequences of safety incidents. This includes the use of appropriate clothing and protective equipment, as required. Suppliers should also proactively engage with their local communities to address HSE and other concerns.

4.2 Compliance with Health, Safety, Environmental and Quality Regulations

Suppliers shall comply with all applicable quality, health, safety and environmental ("HSE") regulations and in their absence, to international standards. All required permits, licenses and registrations are to be obtained, maintained and kept up to date and copies provided on request.

Suppliers shall have appropriate controls to manage, measure and minimize risks to acceptable levels to prevent environmental incidents and minimize pollution. Suppliers should aim to optimize energy consumption, water consumption, emissions and waste and be able to prove by reference to written records the tracking of such data.

Suppliers shall have in place appropriate systems to enable effective communications on safety information linked to any identified workplace risk, and including regulatory changes, with employees, contractors, suppliers and customers.

4.3 Environmental Protection

Suppliers are expected to use natural resources (e.g. sources of energy, water and raw materials) in a way that minimizes negative impacts on the environment, biodiversity, climate change and water scarcity. Suppliers are also expected to engage in the environmentally sound development, manufacturing, transport, use and disposal of their products. Suppliers shall also commit to engage in the development and/or usage of products and processes that reduce consumption and emissions to air, water and soil.

4.4 Emergency Preparedness

Suppliers shall identify, assess and plan for likely and potential emergency situations in the workplace and minimize their impact to people, assets, communities and the environment.

4.5 Training

Suppliers shall make available safety information on identified workplace risks and employees shall be correspondingly trained on a regular basis to ensure they are adequately informed.

4.6 Reporting, Evaluation and Improvement Plans

Suppliers shall have systems to report, investigate and learn from HSE incidents. Improvement plans to address HSE performance gaps must be in place.

SUPPLY CHAIN AND SUBCONTRACTORS

5.1 Sustainable Procurement

Suppliers are expected to have appropriate systems and controls to promote sustainable procurement within their supply chain and communicate the principles set forth in this Supplier Code of Conduct.

5.2 Subcontractors

If the use of subcontractors is contractually allowed, suppliers should make sure that any subcontractors employed to carry out business for ADAMA also comply with the principles described in this Supplier Code of Conduct.

5.3 Product Stewardship

Where applicable, Suppliers must be fully aware of the requirements for ensuring safe handling and responsible use and disposal of ADAMA products, including packaging providing information and training over the lifecycle of relevant products. It is expected that suppliers also replicate this action with their own business partners.

GOVERNANCE AND MANAGEMENT SYSTEMS

6.1 Legal and Other Requirements

Suppliers are expected to comply with all applicable laws, regulations, contractual agreements and generally recognized standards.

6.2 Sanctions

Suppliers are expected to:

- Fully comply with all lawful sanctions' regimes affecting their business; and
- Implement effective internal controls to minimize the risk of any non-compliance with relevant sanction regimes, including training and support for their employees and contract workers; and
- Solely bear the risks and liabilities resulting from any non-compliance rules, regulations and sanctions/trade restrictions (whether international or a result of negligence).

6.3 Commitment

ADAMA takes compliance seriously. We expect that all our suppliers follow and adhere to the principles laid out in this Supplier Code of Conduct. If you would like to further explore or understand the elements of this Supplier Code of Conduct, please reach out to us via the email address indicated below.

Email address: coc.supplier@adama.com

6.4 Risk Management

Suppliers should have appropriate mechanisms to identify, determine and manage risks in all areas addressed by this Supplier Code of Conduct.

6.5 Right to Audit

ADAMA expects that all the suppliers we work with share the principles and values that are outlined in this Supplier Code of Conduct. ADAMA may request that suppliers provide information, certificates, participate in assessments or undergo on-site audits.

6.6 SpeakUp

At ADAMA we promote a high standard of ethical and professional conduct. Suppliers, their workers and subcontractors may report any known or suspected violations of this Code of Conduct, or of any applicable laws or regulations to ADAMA's ethics hotline ([compliance helpline](#)), on a confidential and anonymous basis.



ADAMA