

HORTEX GROUP

CODE OF BUSINESS CONDUCT

Dear Partners,

For over sixty years, companies constituting the Hortex Group have been producing the highest quality frozen food, juices, nectars, bottled waters and beverages to better meet the needs of their clients and constantly enjoy their trust. In the interest of our client, we have been meeting the new trends, introducing innovative product categories and adapting to the changing lifestyle of our clients.

We want “Hortex” and “Jurajska” brands, well recognizable both in Poland and on foreign markets, to be constantly associated with the highest quality, with perfection of workmanship and naturalness without compromise. Our commitment, imagination and passion for creation makes our products exceptional.

Here, at the Hortex Group, we strive to conduct our business in a lawful, ethical, transparent, fair and honest manner. Our values and principles that guide us in our business activity are contained in this Code of Business Conduct, in which we have also indicated what attitudes and actions are unacceptable to us.

We demand a lot from ourselves, but it is equally important for us that our Partners observed our values and principles and – together with us – cared for the highest quality of our products, our reputation and the best perception of “Hortex” and “Jurajska” brands among our clients.

We encourage you to read our Code of Business Conduct and to apply the rules it contains to our everyday cooperation.

HORTEX GROUP RULES OF CONDUCT

1) We do not tolerate any corrupt behavior, we prevent and protect the Hortex Group against all acts of financial fraud, terrorist financing or money laundering

We conduct our business in accordance with the law, highest ethical standards, respecting the restrictions resulting from international sanctions and excluding the territories covered by such sanctions. We fulfill our financial obligations in accordance with applicable regulations. We take all the necessary actions to prevent any fraud, corruption and bribery. In this regard, we ensure that companies constituting the Hortex Group implement procedures to counteract such behavior and they conduct training for their personnel.

Each of the companies constituting the Hortex Group sets out the rules for receiving or giving donations and ensures the correctness of sponsorship, charity and other aspects of the company's financial activities. In our business activity, we take into account the principles of compliance and avoidance of irregularities adopted at the ownership level, we also respect the standards arising from our membership in economic and industry organizations, in particular – the standards applicable to the companies constituting the Hortex Group in connection with the cooperation within MID Europa Partners.

We do not accept nor offer, directly or indirectly, any unlawful benefits in connection with our business activity and we prohibit accepting any benefits of this kind to persons employed by us or cooperating with us. Our employees and co-workers whom we authorize to act on behalf of the companies constituting the Hortex Group (in particular to enter into commitments) are authorized only to the actions explicitly indicated by us in the power of attorney granted or resulting from the mandatory provisions of law.

We require all our employees, co-workers and Partners to have the same approach to preventing and eliminating fraud in their business activity, including an absolute non-acceptance of irregularities.

2) We conduct our business activity with due respect to the principles of fair competition, observing our obligations regarding the trade secret and non-infringement of intellectual property rights

We build our business relations based on our values, in a manner consistent with the law and the highest standards of business ethics. We comply with the highest standards in securing the confidentiality of information, in particular the trade secret.

We respect the intellectual property rights of our Partners and co-workers.

We avoid conflicts of professional interests with personal interests. In our business activity we are guided by the Hortex Group's good, which is why we avoid any activities that could call our business integrity into question. To this end, we define the rules for establishing and maintaining business relationships, in particular in regard to contacts with persons discharging public functions.

3) We cooperate with entities that meet the criteria of lawful and ethical business conduct and we exercise due diligence in establishing cooperation with business Partners

Before establishing the cooperation, we verify our potential business Partners in order to exclude the risk of irregularities and to ensure that we cooperate only with the entities that provide a lawful and ethical cooperation in accordance with the rules in force in the Hortex Group. We supervise and evaluate the cooperation on an ongoing basis and we immediately respond to any irregularities identified.

Each day we require our personnel and business Partners cooperated on the basis of the consistent high standards. We resign from the cooperation with Partners that do not meet our requirements and do not comply with our business standards.

4) We follow a responsible employment policy. We comply with the labor law, we eliminate any forms of discrimination and mobbing. We provide freedom of trade union activity

We have implemented clear and legible recruitment criteria, we employ people who provide the best quality of their duties performance, who share our values and follow the rules in force at the Hortex Group. At the Hortex Group, we provide competence-based human resources management, transparent principles of the employee appraisal, and support for professional development. Our personnel undergo regular training to ensure the compliance with the rules in force at the Hortex Group and to enable competence development.

We strictly adhere to the provisions of the labor law, we respect employees and take all the necessary actions to build a friendly work environment for them. We provide trade unions with freedom of activity. We respect diversity, and promote tolerance and respect for individuality. We eliminate any manifestations of discrimination and mobbing of employees, especially through training and implementation of internal procedures for reporting irregularities.

We expect our business Partners to respect the above mentioned principles.

5) We ensure the proper protection of personal data and we carry out ongoing audits in this area

At Hortex Group, we ensure the security of personal data and we adhere to the rules related to their correct processing. In particular, we protect personal data against any unauthorized access and accidental loss. We have implemented the necessary documentation in the personal data protection area and we regularly train our personnel in this scope.

In the Hortex Group companies we have appointed a Data Protection Inspector who is responsible for monitoring compliance in the area of personal data.

6) We protect the highest quality and safety of our products

We particularly care to provide our clients with the highest quality products.

The raw materials supplied to us are subject to detailed, multi-stage control and quality assessment based on the highest industry standards, we carefully select our suppliers. Our requirements for raw material suppliers are closely related to our quality policy and are described in the agreements concluded with the suppliers.

We modernize our plants, we introduce the latest management systems and build a professional team. In our plants we have implemented:

- IFS / BRC Systems, guaranteeing the maintenance of the highest quality and safety of manufactured products;
- Quality management system in accordance with ISO 9001: 2000, enabling the maintenance of product quality and improvement of all processes implemented in the Hortex Group related to the production and delivery of products;
- HACCP System, which allows to identify the client's health risks from the product, and then eliminate or reduce them to a safe level;
- GMP and GHP standards, ensuring testing of raw materials and other materials, product, raw material and other material identification systems, modern infrastructure, hygiene of production areas, employee hygiene and plant security.

The production systems and processes implemented in the Hortex Group are integrated into one management system, and our plants hold DNV (Det Norske Veritas) certification unit that confirms their implementation and functioning.

We expect from our business Partners an equally responsible approach to the implementation of internal quality control processes, to the extent required for their business.

7) We provide all our personnel members with safe and healthy work conditions and caring for their life and health is our priority. We properly care for the assets of the Hortex Group and the entrusted property

We have implemented the OHSAS 18001 system for health and safety management and the crisis management procedure. We strictly comply with health and safety regulations and we train our personnel in this regard.

We have appointed persons responsible for health and safety supervision. We strive to minimize risks in the field of people and property security, and we immediately remove the identified threats. Because of the internal protection and monitoring systems as well as concluded insurance contracts, we take care about the security both of our own and entrusted property.

8) We care for the protection of environment and minimizing the adverse impact on the environment

In our productions plants we have implemented ISO 14001 environmental protection standard, that allows us to conduct our production in a way that ensures maintaining a balance between

its profitability and minimizing its impact on the natural environment. We inform our contractors and suppliers about the rules of conduct that they are required to follow in relation to the implemented standard.

We modernize our production facilities, among others: in order to reduce the consumption of water, energy, fuels, natural resources and pollutant emissions - we monitor and rationalize consumption, as well as constantly reduce emissions, we use closed water circuits and rebuild sewage treatment plants. We reduce CO2 emissions and we invest in energy-saving lighting. We care about recycling and further use of raw materials, cooperating in this respect with local governments. We run waste segregation management, we transfer them only to authorized recipients, we systematically reduce their quantity. We care for systematic training of our personnel in the field of environmental protection.

9) We take care of our clients and the Hortex Group reputability

We pay attention to have good relations with our clients, we respect their rights and we promote client-oriented activities and attitudes. In addition to the product control and quality assurance systems, we have implemented a system of the clients' requirements and needs testing, and a complaint procedure.

We communicate honestly and openly with our clients in advertisements, in social media, and through clear product packaging labeling. We use the media and social media responsibly, we care about the quality and consistency of the external and internal communication - to the personnel employed in the companies constituting the Hortex Group.

We plan and run our marketing campaigns responsibly. We react immediately in case of the crisis in media.

We run the websites www.sokihortex.pl , www.hortex.pl and www.jurajska.pl, through which we enable the direct contact with the PR department of the Hortex Group, including the contact form available at the websites.

10) We cooperate with Partners who share our values

We take the rules of conduct for the Hortex Group seriously and responsibly, which is why we expect our business Partners and people who want to join our team to share the values specified in this Code. For this reason, before establishing cooperation we determine whether our business Partners define and apply appropriate ethical standards in their activity.

11) We have implemented an infringement reporting system at the Hortex Group

At the Hortex Group companies we have adopted a procedure of reporting any infringements and non-compliance with the aforementioned rules of conduct and standards. Every employee or co-worker may submit a report to us, including in a way that ensures the anonymity of the report.

We protect whistleblowers against any kind of retaliation. At the same time, we provide an adequate level of protection to the persons whom the report concerns.

We respond immediately to any suspected offense and perform all obligations under the applicable law in this regard. We cooperate with authorities appointed to clarify all circumstances of such an event.

12) We have implemented a compliance system in the Hortex Group

We ensure compliance with the standards determined in this Code in each of the companies constituting the Hortex Group. Our companies have appointed a Compliance Officer responsible for overseeing all activities related to ensuring compliance with these standards.

The Compliance Officer is available to contact at the email addresses:

- a) etyka@sokihortex.pl (in matters related to Hortex Sp. z o.o.);
 - b) etykaPR@sokihortex.pl (in matter related to Hortex Plant in Przysucha);
 - c) etyka@hortex.pl (in matters related to Polski Ogród Sp. z o.o.);
 - d) etykaSK@hortex.pl (in matters related to Polski Ogród Plant in Skierniewice);
 - e) etyka@jurajska.pl (in matters related to Jurajska S.A.);
- or at the correspondence address of a given company or plant (such correspondence should be annotated: “*To the attention of the Compliance Officer*”).