

# General Code of Conduct

*AB Group's General Code of Conduct adopted by Management Board,  
Resolution No. 7/2022 dated December 2, 2022.*

*The resolution, signed by the full Management Board, became effective on the date of adoption.*

## **PART I. SCOPE OF THE CODE**

### **1. Scope of the Code**

The General Code of Conduct (referred to as the "Code") defines ethical standards and principles of conduct to be followed by all employees of AB Group S.A., hereinafter referred to as the "AB Group", in their activities. The Code is applied in the context of other internal regulations relevant for each of the AB Group companies with the purpose of preventing risks to the AB Group's reputation, particularly the trust built up over the years among our employees, shareholders, customers, suppliers and communities.

### **2. Scope of application and implementation by subsidiaries**

This document has been prepared by AB S.A., the parent company within the AB Group. It is applicable to the entire AB Group, shared with all subsidiaries, and it sets forth the rules applicable to these entities.

### **3. Persons subject to the Code**

This Code applies to all officers and employees of the AB Group. Employees are also subject to other codes of conduct applicable to their functions and activities. The Code contains the main principles by which we ensure compliance with relevant regulations and meet the expectations placed on us as a Group with the highest ethical standards.

### **4. Obligation to become familiar with and comply with the contents of the Code**

Those subject to the Code are required to familiarize themselves with its contents, comply with it, and participate in its implementation within the AB Group, including informing management and the Legal Department of any violations of the Code. Persons subject to the Code are required to attend all training courses to which they are invited to become duly familiar with the Code.

## **PART II. GENERAL ETHICAL STANDARDS APPLIED IN THE AB GROUP**

AB Group's business operations are based on its organizational culture, which also sets guidelines for AB Group's relations with employees, customers, suppliers, shareholders and local communities. The mission of those subject to the Code in connection with their employment at AB Group is to help customers succeed every day, recognizing quality as a fundamental factor in ensuring customer satisfaction and competitive advantage. The company's goal is to satisfy customers' needs by building long-lasting and stable relationships based on merchant's integrity and offering products of the highest quality using state-of-the-art sales techniques.

### **Ethical principles applicable to the AB Group:**

#### **1. Equal opportunity, diversity and non-discrimination**

AB Group employees subject to the Code are recruited, hired, compensated, and subject to promotions based on their skills and knowledge, experience, leadership skills, diversity of thinking styles, and potential for growth. Meritocracy is a fundamental principle in the process of attracting, retaining, hiring and developing talented employees.

## **2. Respect for others**

Disrespect, discrimination, harassment, intimidation or any other manifestation of physical or verbal aggression is unacceptable and will not be tolerated in the workplace. If employees become aware of behavior of the above nature, they are required to notify the personnel department.

## **3. Balance between personal and professional life**

The AB Group, in carrying out its commitment to improving the quality of life of employees and their families, takes all measures and uses helpful instruments to promote the pursuit of a work environment that provides employees with opportunities for personal development, supporting them in achieving the maximum balance between their professional responsibilities and their personal and family lives.

## **4. Preventing occupational risks**

Employee safety and health care is a cornerstone for the AB Group in creating a friendly and safe work environment. Continuous improvement of working conditions is a priority for the AB Group. Employees subject to the Code should in any case comply with the principles of health and safety at work using the organization's resources and ensure safe working conditions for members of their teams.

## **5. Environmental protection and social and environmental responsibility policies**

We promote business activities that include economic aspects and at the same time are environmentally friendly, including:

- using and developing environmentally friendly technologies;
- compliance with national and EU standards, relating to the environment;
- compliance with internally adopted environmental regulations;
- striving to minimize the impact of business activities;
- taking initiatives to promote environmental awareness;
- providing stakeholders with access to environmental information.

## **PART III. GENERAL STANDARDS OF CONDUCT**

### **1. Comply with (external and internal) rules and regulations and act in accordance with ethical 'standards**

- Employees subject to the Code should act in accordance with laws, regulations, as well as internal AB Group regulations applicable to the business area (i.e., internal policies, procedures, codes and other rules). All employees, officers, Management Board and Supervisory Board members are required to be familiar with the responsibilities of their positions and to act in accordance with the applicable requirements.
- Employees subject to the Code should act in accordance with the principles of integrity, impartiality and honesty.

### **2. Protection of free competition**

All employees are required to unconditionally observe the principles of fair competition and act in accordance with the competition laws applicable to the regions of the world, in which they conduct business operations. Each Employee is obliged, in particular:

- to enter into agreements and organized activities that do not lead to a restriction of market competition;
- not to provide competitors or other stakeholders operating in the company's business sphere with any confidential information regarding, among other things, pricing policies, strategies or customer data;
- applying the precautionary principle when conducting business talks;
- failing to induce the company's customers and suppliers, to cease cooperation with competitors, and not to conduct activities related to restricting competitors' access to sources of supply.

### **3. Liability**

Employees subject to the Code should perform their duties for the AB Group in a professional manner with due diligence. In particular, they should:

- strive to reach a skill level that enables them to perform their duties to the best of their abilities;
- follow internal procedures;
- store documents and data in accordance with the rules set forth in the AB Security Policy;
- comply with health and safety regulations to prevent and minimize occupational risks.
- Employees subject to the Code should at all times act in the best interests of the AB Group, ensuring appropriate use of available resources and avoiding any actions to the detriment of the Group. These individuals may not use business opportunities that are in the interest of the AB Group for personal gain.

## **PART IV. STANDARDS FOR DEALING WITH SPECIFIC SITUATIONS**

### **CHAPTER I. CONFLICT OF INTEREST**

#### **1. Generally accepted rules**

In the event that the interests of AB Group conflict with the interests of the Employee, their spouse, relatives and related by affinity up to the second degree, and persons with whom he is personally related, the Employee shall disclose the conflict of interest and refrain from participating in the handling of such matters.

#### **2. Relationships with suppliers**

- Employees subject to the Code who, by virtue of their position, participate in decisions that regard contracting service providers or determining the pricing terms for the provision of such services are required to act in accordance with the guidelines of the Sustainable Purchasing Policy.
- Employees should avoid any situation that could affect their impartiality or objectivity in dealing with suppliers.
- Contracts with suppliers should be concluded in accordance with applicable internal procedures.

#### **3. Anti-Corruption Policy**

AB S.A. does not tolerate any form of bribery or corruption. Detailed regulations in this regard are set forth in the Anti-Corruption Policy and Procedure.

## **CHAPTER II. CONTROL THE FLOW AND CONFIDENTIALITY OF INFORMATION**

### **1. Commitment to maintain confidentiality of information**

- Employees are obliged to keep all information concerning AB and its Group confidential.
- The obligation to maintain company secrecy continues to apply even after the termination of the employment relationship in accordance with the applicable legal provisions on the subject.

### **2. Protection of personal data**

Employees are required to keep confidential any personal data they process in connection with their employment with AB Group. The principles of personal data protection and the security measures used are set out in the Security Policy and related documents. In terms of personal data, the following principles should be applied first and foremost:

- only the necessary data should be collected;
- acquisition, processing in IT systems, and use of personal data should be carried out in such a way as to ensure their security in accordance with the IT system security manual;
- access to the data should be limited to the extent reasonably required by the performance of professional duties.

## **CHAPTER III. COOPERATION WITH OTHER ENTITIES AND CONTACTS WITH REGULATORS**

### **1. Communicating information**

Employees may not communicate to the media, either on their own initiative or at the request of another person, any information concerning the AB Group or third parties. Any request for information should be directed to the unit responsible for communication.

### **2. Relations with competent authorities**

Employees subject to the Code should show respect for and cooperate with representatives of public bodies to the extent of their professional duties. Any affiliation, membership or cooperation with political parties or other types of entities, institutions, associations that operate outside the AB Group structure, or the provision of any services to them, should be done in such a way that such activities are purely private, without involving the AB Group in them.

## **CHAPTER IV. ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM**

### **1. Anti-money laundering regulations**

AB Group complies with all AML regulations applicable to it. AB Group entities cooperate fully with institutions and authorities in fulfilling their obligations imposed by these regulations.

## **CHAPTER V. IT SYSTEMS AND INFORMATION TECHNOLOGY**

### **1. Rules of conduct for the use of information and communication technologies**

- Employees subject to the Code should strictly adhere to the rules set forth in internal regulations on the use of information and communication technologies.

- Their duty is to protect IT systems and maximize their security. Specifically, strive to apply appropriate cybersecurity behaviors.
- Employees are required to acknowledge the fact that they have received/been provided with technological equipment, and are required to return it in the event of leaving the AB Group or transferring from one company to another within the AB Group in accordance with the procedures and within the timeframe specified in the applicable internal regulations
- Specific rules and regulations must be followed for the use of e-mail, Internet access and other resources, which must not be misused under any circumstances.
- When creating an account, participating or collaborating on social networking sites, forums or blogs on the Internet, as well as posting opinions or comments through such channels, employees should ensure that it is clear from the opinions that they are of a private and not professional nature. Employees may not use the AB Group's image, name or brand in the above situation.

## **CHAPTER IV. INTELLECTUAL PROPERTY RIGHTS**

### **1. AB Group's intellectual property rights**

- Employees are required to comply with intellectual property regulations. Employees may use AB resources in the performance of their official duties, and any materials they use should be returned to the AB Group upon request.
- Employees may not use the AB Group's image, name, or brand for any purpose other than the proper performance of their duties for the AB Group.

### **2. Third party rights**

Employees are also required to comply with regulations regarding the intellectual property rights of third parties, particularly AB Group contractors.

## **PART V. APPLICATION OF THE CODE**

### **1. Heads of organizational units of the AB Group**

In accordance with the organizational structure, the heads of each department and the heads of the various organizational units that make up the AB Group entities should ensure compliance with the Code by the Employees of their subordinate units.

### **2. Consequences of violations**

Any violation of this Code may result in the consequences prescribed by law.