



# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



## CONTENTS

OUR BUSINESS PARTNERS ..... 2

HEALTH, SAFETY AND ENVIRONMENT ..... 3

RAISING CONCERNS ..... 4

SPECIFIC COMPLIANCE EXPECTATIONS ..... 5

OUR EXPECTATIONS TOWARDS BUSINESS PARTNERS AT A GLANCE ..... 8



# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



## OUR BUSINESS PARTNERS

Our Business Partners play an integral role in our business. We seek to deal with Business Partners who share our values and we expect our Business Partners to comply with relevant aspects of this Code.

A Business Partner is anyone who does business with LAT Nitrogen, including:

- Suppliers and Service Provider
- Consultants
- Agents
- Sales representatives
- Dealers
- Independent contractors
- Contract workers
- Customers
- Freelancers
- Temporary Workers

We evaluate our Business Partners carefully before engaging with them, and we expect them to conduct themselves in an ethical and compliant manner.

Business Partners who interact with governments must be vetted with extra caution, particularly in countries perceived to be less transparent.

Business Partners must be subject to confidentiality agreements if they have access to confidential or proprietary information.

Business Partners are expected to have policies in place which confirm compliance with following rules:

- Ten Principles of the United Nation's Global Compact
- International Labor Standards of the International Labor Organization
- United Nation's Guiding Principles on Business and Human Rights and/or OECD guidelines for Multinational Enterprises
- Environment, Health & Safety Standards of Responsible Care.



# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



## Business Partners Commitment

Business Partners shall be selected fairly and without a conflict of interest or any kind of favoritism that might compromise the selection process.

Business Partners shall treat workers legal, respectful and fairly in accordance with minimum wages, minimum age, working time and social insurance requirements without any element of exploitation and human trafficking, provide safe and healthy workplaces, duly effect all social security payments related to its personnel and compensate its personnel not less than with the minimum wages prescribed by law or collective agreement, comply with legal working time requirements on their subcontractors.

Business Partners shall inform LAT Nitrogen without any delay about any compliance & ethics matter that may have adverse impacts on the ongoing business relationship with LAT Nitrogen. Business Partners shall furthermore cooperate with LAT Nitrogen and transparently provide requested for purposes of compliance & ethics related audits and due diligences.

## HEALTH, SAFETY AND ENVIRONMENT

We are committed to safety and protecting the environment. Nothing is more important to us than the health and safety of our workers and employees and those of our Business Partners and their sub-contractors. We also expect everyone to behaving responsibly towards our environment.

LAT Nitrogen is a strong supporter of the industrywide Responsible Care® initiative, which focuses on concerns relating to health and safety and the environment in relation to our business.

We expect our Business Partners to understand and comply with all local environmental and health and safety regulations in the jurisdictions where LAT Nitrogen conducts business.



# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



## RAISING CONCERNS

Where you have a concern about a proposed course of action, or about a current situation with regard to your business relationship to LAT Nitrogen, you shall raise it to your contact person at LAT Nitrogen. If you believe that the contact person is possibly involved, or if you otherwise have concerns or doubts that the contact person will handle your matter with the required priority, please report your concern to the **LAT Nitrogen Whistleblower Hotline "Tell Us"**.

LAT Nitrogen is committed to taking every reported concern very seriously. Every report is carefully reviewed and handled with the utmost sensitivity and confidentiality based on strict need-to-know principle and technical safeguarding of reported information.

The **Whistleblower Hotline "Tell Us"** can also be used for anonymous reporting and is open for reporting of any suspected or witnessed illegal, criminal or otherwise inappropriate misconduct including, but not limited to, human rights, health & safety, labour rights, data protection, anti-bribery & corruption, market abuse and competition law, trade restriction related matters. In handling each report, LAT Nitrogen strictly observes all applicable legal requirements, including but not limited to the EU requirements pursuant the Whistleblower-Directive and the General Data Protection Regulation.

### No retaliation against those who raise concerns

It is essential to the effectiveness of this Code, and to the maintenance of a culture of integrity throughout LAT Nitrogen, that Business Partners, its subcontractors and all of its workers and employees who are directly or indirectly in business relationship with LAT Nitrogen, are encouraged to freely speak up and to use the **Whistleblower Hotline "Tell Us"** without any fear of disadvantage for the reporter.

LAT Nitrogen does strictly not tolerate any sort of retaliation against the reporter and will take any reasonable step to protect whistleblower from retaliation. Reports can also be made anonymously if whistleblower does not want to disclose his/her identity.

#### Ethics hotline

Reports (also anonymous reports) can be made through this link:

[lat-nitrogen.integrityline.com!](https://lat-nitrogen.integrityline.com)



# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



## SPECIFIC COMPLIANCE EXPECTATIONS

### 4.1 YOU AND LAT NITROGEN

#### 4.1.1 Working with each other

We expect our Business Partners to treat everyone with fairness, respect and dignity. We do not tolerate any form of abuse, harassment, discrimination or exploitation. This includes actions that can be considered offensive, intimidating or discriminatory, as well as any form of sexual harassment.

#### 4.1.2 Data privacy

As a Group, LAT Nitrogen is responsible in handling personal information. It is essential that all employees can have confidence that LAT Nitrogen and its Business Partners will treat their personal information sensitively, in confidence and in line with legal obligations. We take our obligations under the General Data Protection Regulation (GDPR) and any other applicable data protection laws seriously and take care to prevent unauthorized disclosure.

We expect our Business Partners to protect the personal information of LAT Nitrogen employees in line with the legal requirements.

#### 4.1.3 Confidential information

Business Partners shall not disclose confidential information of LAT Nitrogen acquired during the course of business to any third party, whether during the course of work or otherwise, unless either:

- they know that the information is not confidential (although, in cases of doubt, staff should assume that information acquired at work is confidential)
- they are authorised to share such information with a specified third party for business reasons



# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



## 4.2 CONDUCTING BUSINESS THE RIGHT WAY

### 4.2.1 Anti-bribery and anti-corruption

LAT Nitrogen does not tolerate bribery and corruption in any of its forms in our business and we comply with anti-bribery and corruption laws and regulations.

Bribes, kickbacks, unfair advantages and other acts of corruption are strictly prohibited by LAT Nitrogen. A bribe is an offer of financial advantage or anything of value which is made in order to induce or reward the improper performance of a function by the recipient.

The bribe may be in the form of money, but may take other forms such as hospitality or payment of travel/accommodation, although, this is not intended to prevent normal corporate entertainment.

Bribery and corruption are criminal offences with severe sentences for both companies and individuals who breach them, including potentially imprisonment; for this reason, non-compliance with these requirements is taken particularly seriously.

As a general guide, Business Partners shall:

- never offer, give or accept payment or anything of value directly or through a third party, in the attempt to gain business or to improperly influence a business decision
- refuse any offer of additional “facilitation payment” for performing a function
- take particular care when dealing with public officials
- maintain accurate bookkeeping and records to honestly describe payments.

### 4.2.2 Anti-competitive behaviour

LAT Nitrogen competes fairly in all markets and countries and does not collude with its competitors in any aspects of its business. It complies with all applicable competition laws around the world.

Laws preventing unfair competition (sometimes known as “antitrust” laws) are complex and fines for violations are severe. In addition, other consequences of such breach include sanctions for individuals, void agreement and damages as well as bad publicity.

We expect our Business Partners to comply with competition law in the course of their Business with LAT Nitrogen.



# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



## 4.2.3 International trade and sanction laws

We are a global company operating in an area (chemicals) subject to international trade regulation. We comply with all trade laws of all countries in which we operate including sanction, import and export control and customs laws that apply to the crossborder trade of our products and services.

Business Partners involved in the cross-border trade of our products and services shall:

- comply with applicable trade control and sanctions laws and applicable custom procedures
- consider sanction risks as part of the business opportunities and business partners.

## 4.2.4 Due Diligence Requirements

As part of our Compliance Management System (CMS), LAT Nitrogen continuously reviews the integrity of its Business Partners. The process includes evaluation and monitoring all business partners acting on behalf or who provide services to LAT Nitrogen. We expect our Business Partners to apply their own monitoring and reviewing processes to ensure integrity and compliancy of its own suppliers.

Watch out for:

- New markets: Business in new countries, and particularly countries that are subject to international trade restrictions or sanction programmes.
- Dual-use trade controls: Dual-use items are goods, software and technology that can be used both for civilian and military applications. Transit of dual-use items may include transfer via email, download, meetings, discussions, or visits and may be subject to export control requirements. Dual-use trade control may affect business with spare parts and plant components.

## 4.2.5 Preventing money laundering

Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. It also covers the use of legitimate funds to support crime or terrorism.

Never become involved in money laundering.



# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



## OUR EXPECTATIONS TOWARDS BUSINESS PARTNERS AT A GLANCE

We are committed to a culture of ethics and compliance in which we conduct our global business with integrity and in accordance with applicable laws and regulations.

- We expect our Business Partners and their sub-contractors to all treat their workers fairly, legal and respectfully.
- We expect our Business Partners to speak up when they see potential violations of law, regulation policy or this Ethics Policy.
- Our Business Partners are required to all its workers to speak-up and refrain from any retaliation. Nothing is more important to us than the health and safety of our employees and behaving responsibly towards our environment and safety of our workers and employees and those of our Business Partners and their Sub-Contractors and behaving responsibly.
- We expect our Business Partners to treat everyone with respect and to not tolerate unfair treatment, harassment, abuse or retaliation within the workplace.
- We expect Business Partners to protect personal data and confidential information.
- We expect our Business Partners to not accept or offer bribes, kickbacks or anything of value to obtain a business advantage.
- We expect Business Partners to not enter into any form of agreement or understanding with competitors to fix prices or otherwise restrict free competition.
- We expect our Business Partners to carefully evaluate and check their own suppliers and ensure they are conducting business in an ethical and compliant manner.





# Ethics policy for business partners

CODE OF BUSINESS CONDUCT



Date of issue: August 2023

*LAT Nitrogen is a leading European provider of nitrogen-based products in the fertilizer and industrial chemical market. The company was created through the acquisition of Borealis Fertilizer, Technical Nitrogen and Melamine business by Agrofert in 2023. LAT Nitrogen employs nearly 2,000 employees across Europe and has production units located in Austria, France and Germany. The company has an extensive warehouse and commercial network in Western, Central and Eastern Europe.*

*LAT Nitrogen supplies fertilizers, technical nitrogen products and melamine solutions to respectively farmers, industrial players and the woodworking industry. Our products and services are produced close to our markets and developed as responsible solutions which contribute to the development of sustainable farming and improving living conditions. Being part of the energy intensive industry, we want to be a driver in the ecological transformation of our industry through new technologies and continuous improvement. Safety is a condition for everything we do.*

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Disclaimer The information contained herein is to our knowledge accurate and reliable as of the date of publication. LAT Nitrogen extend no warranties and make no representations as to the accuracy or completeness of the information contained herein, and assume no responsibility regarding the consequences of its use or for any errors. It is the customer's responsibility to inspect and test our products in order to satisfy himself as to the suitability of the products for the customer's particular purpose.

The customer is also responsible for the appropriate, safe and legal use, processing and handling of our products. Nothing herein shall constitute any warranty (express or implied, of merchantability, fitness for a particular purpose, compliance with performance indicators, conformity to samples or models, non-infringement or otherwise), nor is protection from any law or patent to be inferred. Insofar as products supplied by LAT Nitrogen is used in conjunction with third-party materials, it is the responsibility of the customer to obtain all necessary information relating to the third-party materials and ensure that LAT Nitrogen products, when used together with these materials, are suitable for the customer's particular purpose. No liability can be accepted in respect of the use of LAT Nitrogen products in conjunction with other materials. The information contained herein relates exclusively to our products when not used in conjunction with any third-party materials.

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