



**AGROFERTRANS®**

Leonard House, 5-7 Newman Road, Bromley, Kent, BR1 1RJ, United Kingdom.  
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Agrofertrans Limited is a multinational company with a wide trading area of business, specializing on research, innovation, production and distribution activities and has employees and counterparties around the world. Agrofertrans Limited is doing business in ways that are transparent, ethical, demonstrate high personal integrity and respect for the rights of individuals.

### **Purpose of the Code of Ethics.**

This Code of Ethics outlines the standards of conduct expected of all employees, representatives, managers, agents, partners, etc. of Agrofertrans Limited, a company, committed to ethical business practices and social responsibility. The Code is intended to provide guidance on ethical decision-making and behavior, and to ensure that the company operates with integrity, honesty, and transparency. As a multinational company with employees and partners around the globe Agrofertrans Limited has always been committed to the norms and rules of ethical behavior in conducting our business activities.

The Code covers general and trading-specific provisions.

### **1. General provisions:**

1.1. Honesty and Integrity. We uphold the highest standards of honesty and integrity in all our dealings, with clients, suppliers, and regulators. We are committed to truthful and accurate communication, and to ensuring that all our transactions are conducted ethically and transparently.

1.2. Fairness and Transparency. We believe in fair and transparent business practices, and we strive to ensure that all our transactions are fair and equitable. We are committed to providing clear and accurate information to our clients and stakeholders, and to ensuring that our business practices are ethical and responsible.

1.3. Confidentiality and Privacy. We respect the confidentiality and privacy of all our clients and stakeholders. We take appropriate measures to protect their sensitive information, and we use it only for legitimate business purposes.

1.4. Intellectual property. The company recognizes the importance of innovations in business and respect the terms of intellectual property law. The company works with respect to others intellectual property rights and pays careful attention to appropriate use of the results of intellectual work of other people and companies, like using only licensed equipment and programs, respect towards third parties trade marks, etc.

1.5. Compliance with Laws and Regulations. We comply with all applicable laws and regulations, and we ensure that all our employees are aware of their obligations under these



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laws. We do not engage in any illegal or unethical activities, and we report any suspected violations to the appropriate authorities.

1.6. Conflict of Interest. We avoid conflicts of interest and take steps to manage any conflicts that may arise. We do not use our position or influence for personal gain, and we do not engage in any activities that may compromise our objectivity or integrity.

1.7. Social Responsibility. We are committed to being socially responsible and ethical in all our activities. We consider the impact of our business practices on the environment, our treatment of employees, and our contribution to the community.

1.8. Anti-Bribery and Corruption. The company has a zero-tolerance policy for bribery and corruption. We do not offer, solicit, or accept bribes or other illegal payments, and we do not engage in any corrupt practices. We comply with all anti-bribery and corruption laws and regulations, and we maintain strict controls to prevent bribery and corruption.

1.9. Fair competition. In our business we value the fair competition both on the market and on the work place. The company acts with high ethical standards towards market competitors and according to transparent market rules.

1.10. Whistleblower Protection. The company recognizes the importance of reporting suspected violations of the code of ethics or any other illegal or unethical behavior. Employees and representatives who report suspected violations in good faith will be protected from retaliation or reprisal. The company will investigate all reports promptly and take appropriate action if necessary.

1.11. Environmental Responsibility. The company recognizes the importance of environmental responsibility. We seek to minimize our environmental impact and promote sustainable business practices. We comply with all environmental laws and regulations, and we take proactive measures to reduce waste, conserve energy, and minimize our carbon footprint.

1.12. Health & Safety. The company recognizes the importance of safe work space and environment and is constantly working on the improvement of the security measures, safety of the employees and representative, as well as caring about the health our employees, managers, representative, etc. Employees are provided with the work conditions and environment, which are safe and favorable for employees' health care.

1.13. Continuous Improvement. We continually review and improve our ethical practices to ensure that we maintain the highest standards of conduct. We seek to enhance our reputation as a trustworthy and reliable trading partner, and we encourage all employees and representatives of the company to adhere to the code of ethics.



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1.14. Equal opportunities, harassment, discrimination & Bullying. The company has a zero-tolerance policy towards any kinds of discrimination based on race, color, religion, national origin, sex, gender, age, marital status, medical conditions, sexual orientation, or any other characteristics that are protected by law.

## **2. Trading-specific provisions:**

2.1. Professionalism. As the global company, we are subject to highest standards of ethical conduct and behavior. The trading in the company is conducted by experienced professionals with appropriate education and relevant job experience on the market and in compliance with the professional ethical requirements towards trader's activity. The professionalism requirements apply to all partners, officers, directors, managers, as well as independent contractors.

2.2. Compliance with Trading Rules. We comply with all applicable trading rules and regulations, including those established by exchanges, regulators, and other governing bodies. We maintain appropriate controls to ensure that we comply with these rules, and we report any suspected violations to the appropriate authorities.

2.3. Due Diligence. We conduct appropriate due diligence on our trading counterparties to ensure that they meet our standards of conduct and integrity. We do not engage in any transactions with counterparties who are known to engage in illegal or unethical activities.

2.4. Supplier Responsibility. The company is committed to ensuring that our suppliers and business partners share our commitment to ethical business practices and social responsibility. We expect our suppliers to adhere to the same standards of conduct outlined in this code of ethics, and we take appropriate measures to ensure that our supply chain is free from illegal or unethical activities.

2.5. Product safety and quality. As the global trading and production company, we strive to maintain the highest standards of the quality of the products we produce and the products we sell. The safety of the products to the customers and to the end user is our core value. The company has strict rules with regard to product quality checking and control.

2.6. Insider Trading. We strictly prohibit insider trading, which is the use of confidential or non-public information to gain an unfair advantage in trading. We comply with all applicable securities laws and regulations, and we do not engage in any activities that may be considered insider trading.



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2.7. Market Manipulation. We do not engage in any activities that may manipulate the market or create an artificial price for a fertilizers or other commodity. We do not engage in any activities that may be considered market manipulation.

2.8. Best Execution. We strive to obtain the best possible execution for our clients' trades, taking into account factors such as price, speed, and certainty of execution. We maintain robust systems and controls to ensure that we achieve best execution for our clients.

### **Implementation.**

All employees and representatives of Agrofertrans are expected to read and understand the code of ethics and to adhere to its principles. The company will provide training and guidance to ensure that all employees are aware of their obligations under the code. Any suspected violations of the code will be investigated promptly, and appropriate disciplinary action will be taken if necessary.

### **Conclusion.**

The code of ethics reflects Agrofertrans' commitment to ethical business practices and social responsibility. By adhering to the code, we can build trust with our clients and stakeholders, and help create a more sustainable and responsible business environment. The company will review and update the code of ethics periodically to ensure that it remains relevant and effective.