



Code of Conduct

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CONTENTS

Introduction
What it is.....4
Who it is for.....5

Letter from the Executive Director.....6

Code of Conduct
Respect for human rights.....7
Working conditions and safety at work.....9
Quality of products and services.....10
Anti-corruption policies.....11
Industrial and intellectual copyright.....12
Environment.....13
Compliance with regulations in Agriculture.....15

Compliance with the Code of Conduct
General responsibilities.....17
Responsibilities of the managerial staff.....17
Conflicts of interest and application of the code.....17
How to denounce an action.....19
Consequences of non-compliance with the code.....19

Introduction

What it is

Tradecorp is today a global company operating in more than 60 countries and a multi-cultural team of professionals of many nationalities. Thanks to this diversity, together with the exchange of information and experiences between the different areas, Tradecorp has a broad perspective of the world in general and, more specifically, of the agricultural sector.

On the other hand, diversity can, on occasions, also bring with it incompatible points of view and may even be the cause of controversies. Therefore, there is a series of guidelines in this Code of Conduct based on the United Nations Global Compact and on Tradecorp's own values and all members of Tradecorp should respect this code in their daily working life.

The guidelines laid down in this Code of Conduct are neither exhaustive nor complicated and they can be summarised in the premise "always do the right thing", in other words, following the laws of the different countries, and treating others with respect.

Who it is for

This Code of Conduct is aimed especially at all those persons who are a part of Tradecorp. However, the principles laid down in the code are in many cases backed up by different laws and by the declarations of the United Nations, and it is hoped that other Tradecorp stakeholders, such as collaborators and suppliers, also abide by the code.

Letter from the Executive Director

At the beginning of 2012, Tradecorp joined the United Nations Global Compact, confirming its commitment with a series of ethical principles related to human rights, labour, protection of the environment and anti-corruption. Although these principles have been divulged internally to ensure their compliance, Tradecorp has decided to go one step further and establish a Code of Conduct applicable to all the persons who form a part of Tradecorp.

In this Code of Conduct, we enlarge on and enter into detail with regard to the Global Compact regarding Tradecorp's strategy. Certain other in-house guidelines are included and these have helped us to gain the confidence of our stakeholders converting us into the company we are today and guiding us towards the fulfilling of the mission and vision that we have established as a company.

Nicolas Lindemann
Executive Director

Code of Conduct

Tradecorp undertakes to comply with the legislation, standards and regulations of the countries and communities where it operates. Furthermore, as a signatory of the Global Compact, it undertakes to respect the principles of this international initiative, the rights laid down in the Universal Declaration of Human Rights and the principal agreements of the International Labour Organisation.

Respect for human rights

Respect should be paramount in all areas of Tradecorp's work. To summarise, it is a question of treating colleagues, clients and collaborators in the same way as we expect to be treated by them.

- In Tradecorp we will respect other people's dignity, equality, diversity and the rights inherent to all human beings.
- Discrimination will not be tolerated under any circumstances, whether it be due to race, sex, religion, nationality, age, sexual orientation, physical or mental handicap, family situation, political beliefs or any other question.
- Within Tradecorp no cases of harassment, abuse, intimidation, lack of respect and consideration or any physical or verbal aggression will be tolerated.





Working conditions and safety at work

Tradecorp recognises that its personnel are its greatest asset. It therefore guarantees respect for human rights and pays special attention to the working conditions of its workers, together with the health and safety conditions for their professional activities.

- Tradecorp will not tolerate child labour, as established in international conventions.
- Tradecorp will not permit any kind of forced labour whether it be slavery, people trafficking, exploitation, confinement in the workplace, etc.
- Tradecorp's working environment will be a safe and healthy space where its employees can develop their responsibilities in a professional way which encourages improvement.
- Tradecorp will minimise any health risks and will work to improve the safety of its workers both in the factories and laboratories and in the offices.
- In order to avoid any situation of risk, applicable preventive measures will be applied at all times regarding health and safety at work, using the resources established by the organisation and ensuring that the team members carry out their activities in secure conditions.
- Safety at work will be included throughout the life cycle of the production and distribution chain.

Quality of products and services

Tradecorp's commitment to quality is specified in the mission and vision of the company and it is one of the added values of the company. Therefore, the quality of all products and services will be supervised and ensured at all times.

- Tradecorp undertakes to guarantee the quality of its products, carrying out exhaustive quality control of the raw materials, manufacturing processes and of the final product.
- Tradecorp will encourage innovation and the use of technology to improve and promote the quality and performance of crops, always maintaining a stance geared towards the protection of the environment.
- Tradecorp will work with clients, suppliers and collaborators to encourage the safe and efficient use of its products.

Anti-corruption policies

Corruption is an attack on integrity and represents a bad use of power and position and its effect on the less favoured is out of all proportion. Tradecorp has taken a stance against all corruption in its actions.

- Tradecorp undertakes to document and detail appropriately all legal and financial actions and transactions in accordance with legal requirements and applicable accounting standards, and in accordance with those required by independent auditors.
- We work in favour of competition. We will not carry out any action in favour of anti-competition or monopolies.
- Tradecorp undertakes not to make any donations to political parties, politicians or related institutions.
- We are all responsible for the company's goods and for using them in the appropriate way. The company's goods will not be used for personal gain or for the benefit of another party that is not the company.
- Disloyal, deceitful or confusing practices will not be allowed.
- It is forbidden for any supplier, client or other external agent to offer, request or accept any kind of payment, commission, gift or retribution for any activity carried out in all of Tradecorp's commercial, administrative or industrial relations, and it is likewise forbidden to take advantage of one's position for personal gain. This limitation does not include:
 - Advertising objects with little value and normal invitations that do not exceed limits considered reasonable in general use, social occasions or through courtesy.
 - Occasional gifts for specific and exceptional cases (such as Christmas presents and wedding presents), provided they are not in cash and are within moderate and reasonable limits.

Industrial and intellectual copyright

Material generated through laboratory work, analysis, tests, agricultural trials and other research elements are the essence of Tradecorp.

- Intellectual copyright will be applied to all research and work in Tradecorp. Likewise, third party intellectual copyright will be respected.
- Use of this material will be in the carrying out of professional activities and all the material used as a support for said studies or trials shall be returned upon request. They will not be used for any other purpose without due authorisation.



Environment

Tradecorp is a company that is committed to the protection of the environment and the sustainable use of natural resources.

- Tradecorp will respect all legal requirements, following established recommendations and procedures to reduce the environmental impact of its activities.
- Within its area of influence, Tradecorp undertakes to respect and promote the principles of the Global Compact with regard to the protection of the environment:
 - Maintain a preventive focus to favour the environment.
 - Encourage initiatives that promote improved environmental responsibility.
 - Favour the development and distribution of technology that respects the environment.
- Tradecorp will encourage good agricultural practices within its scope of influence.





Compliance with regulations in Agriculture

Tradecorp as founding member of EBIC (European Biostimulant Industry Council) and of other Associations and Consortia acting into the worldwide agricultural markets shows its full commitment with the regulations and the codes of conduct signed and approved by Tradecorp. This commitment was sealed with the institutional signature of various codes of conduct and has as main goal to promote transparency into the marketing of all our products and mainly biostimulant products.

Tradecorp will respect and hereby commit that:

- Our production, distribution and commercialization of biostimulants will respect all applicable regulations and laws.
- We will not make any off-label claims for the benefits of our products; in particular, we will not claim any direct plant protection effects that have not been authorized according to the regulations in effect.
- We have compelling scientific evidence to justify any agronomic claims we make for our products.¹
- We will make sufficient information about the scientific evidence available to the public in order to enable informed decisions about purchasing and use and, if requested, we will provide authorities with access to the full data from our research, subject to data protection and confidentiality provisions.

Tradecorp encourages farmers and join forces to allow them making informed choices about the additional benefits that biostimulants can bring to their crop management systems.

The compliance of these conduct actions is monitored by the Head of Regulatory Affairs and be incorporated as part of the ethical principles applicable to all the persons belonging to Tradecorp.

1. This evidence may consist of literature from reputable scientific sources or bespoke research conducted by or on behalf of the producer, in line with established good practices for experimentation and any guidelines developed by EBIC for justifying claims.

Compliance with the Code of Conduct

The majority of the guidelines laid down in this Code of Conduct are based on the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and on the United Nations Global Compact. Therefore, although this code is specifically aimed at the persons who are a part of Tradecorp, it is also expected that other stakeholders also comply with it. Likewise, Tradecorp undertakes to establish other mechanisms to evaluate its suppliers and collaborators' compliance with human and labour rights.

General responsibilities

- All persons who are a part of Tradecorp should know, understand and apply the Code of Conduct within their area of activity.
- In the event of doubts or complaints, personnel are asked to get in touch with the person responsible for their department or to use the following e-mail address: bestpractices@tradecorp.sapec.pt

Responsibilities of the managers and directors

- Persons in a position of responsibility, managers and department directors should be the best models for compliance with the code.
- They should ensure that their team reads, understands and applies this Code of Conduct in their daily activities.
- Furthermore, they should resolve any doubts or questions that may arise from members of their teams.

Conflicts of interest and application of the code

Conflicts of interest arise when the personal interferes with professional activities, making it difficult to decide or act in the best interests of the company. In the event of there arising any conflict of interests or doubts about how to act in a specific moment, we suggest the following guidelines be followed:

- Read, understand and comply with the guidelines of the Code of Conduct: Does the action comply with Tradecorp's Code of Conduct?
- Comply with all international and local standards and laws: Is the action legal?
- Use your best judgement: Is it ethical? Does it reflect my image and that of the company well? Would I like to read about this in the press?

If the answer to any of these questions is "no", don't do it. If you continue to have doubts, consult or ask a superior for advice or use the following e-mail: bestpractices@tradecorp.sapec.pt



How to report a violation of the code

In the event that you have been subject to discrimination, harassment, bad practices or any of the other guidelines laid down in the code, please get in touch with a superior or use the following e-mail address: bestpractices@tradecorp.sapec.pt

A group of impartial professionals will attend to these cases so that the correct steps can be taken and to ensure no reprisals against the employee who, acting in good faith, has contacted us to consult a doubt or to denounce some breach of the code.

Consequences of non-compliance with the code

Non-compliance with the Code of Conduct may result on labour sanctions, apart from all other administrative or penal sanctions that might, in the event, be a consequence of the action in accordance with the worker's territorial workplace.



Alcalá 498 - 2nd Floor
28027 Madrid (Spain)
Tel.: +34 91 3273200
Fax: +34 91 3047172
e-mail: global@tradecorp.sapec.pt
www.tradecorp.com.es