



Code of Conduct

COMMON INFORMATION

Title	Code of Conduct OKECHAMP Group (represents: OKECHAMP B.V. – OKECHAMP S.A.), hereafter OKECHAMP.
Language document	English
Responsible department	HR / QESH
Date latest review	28.04.2026
Status	Concept
Users	All employees, directors and representatives acting for or on behalf of OKECHAMP
Applicability	This Code of Conduct applies to all activities and operations of OKECHAMP
	A Code of Conduct is a set of values, rules, standards and responsibilities or proper practices of an individual party or an organization.
Next review	April 2027
Location	All OKECHAMP locations

REVIEW

The Code of Conduct shall be reviewed at least once every two (2) years by a project group, consisting of members of HR and QESH. Revisions to this Code of Conduct shall be coordinated by the HR Director. The revised Code of Conduct will be forwarded to the CEO (B.V. and S.A.) for approval. Publication of the approved Code of Conduct and procedures are coordinated by the HR Department.

N.B. In the Netherlands approval from the Works Council is needed.

REVISION HIGHLIGHTS

Review date 28/04/2026 – review and update of the Code content, update of contact details at OKECHAMP B.V.

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FOREWORD FROM THE CEO

Dear Colleagues,

Mission, vision, and values are at the heart of every organization. At OKECHAMP, we are driven by a strong mission and vision to provide our customers with the highest quality products and services while also promoting ethical and sustainable practices in all aspects of our business.

As we strive to achieve our mission and vision, we recognize the importance of maintaining the highest standards of integrity, honesty, and accountability. That is why we have developed this Code of Conduct to guide our employees in all their interactions with customers, colleagues, partners, and the wider community.

Our Code of Conduct is not just a set of rules and guidelines; it is a reflection of our core values and a testament to our commitment to ethical and responsible behavior. We believe that by adhering to this Code, we can create a workplace culture that fosters mutual respect, transparency, and trust.

We encourage all our employees to read, understand, and use this Code of Conduct as a tool to guide their daily work. By doing so, we can ensure that we are all aligned with our mission and vision, and that we are working together to achieve our shared goals. Let us all embrace this Code of Conduct and use it to motivate us in our pursuit of excellence and integrity at OKECHAMP.

Yours sincerely,

Robin Barkmeijer
CEO President of the Management Board

LIVING OUR CODE OF CONDUCT

This Code of Conduct (here after the “Code”) reflects ethical values which OKECHAMP implements on a daily basis. At OKECHAMP, we believe in promoting a culture of mutual respect, professionalism, and ethical behavior in all our interactions. As a company that produces mushroom preserves, we understand the importance of sustainability, quality, and safety in our products and services. Therefore, we expect all our employees, customers, and partners to abide by the following code of conduct.

OKECHAMP is committed to a strong and unique corporate culture based on strong values and ethical principles aimed at creating value for all our stakeholders.

The core values of OKECHAMP are:



At OKECHAMP, we consistently apply our values with the goal of realizing our promises. We achieve our goals by applying excellence in everything we do; we are driven by passion; we see opportunities above the obstacles to overcome them; we achieve financial success with integrity, we treat everyone with honesty, respect and dignity and we apply high ethical standards in all our daily operations.



We provide our Clients with high-quality products and services.



Our teamwork, based on effective communication, results in high productivity.



We are responsible and keep our promises.



We are involved, and we set high standards to ourselves and others.



We are good at planning and following our plans.



We develop our competencies.



We are proactive, and never cease to search for improved solutions.



We are constantly learning, expanding our knowledge and perfecting our skills.



We learn from others.



We encourage our Employees to take initiative.



We keep up with modern trends.



We boldly take up challenges.



We are passionate about what we are doing.



We explore opportunities to create an advantage in every field of operation (product, price, quality, organization, processes and ways of operation, communication, image, organizational culture, and the like).



We approach problems, challenges, and changes in a creative way.



We look for the most effective solutions and methods of operation.



We encourage and allow the implementation of good ideas.



We want to stand out because of our unique solutions.



We care about the good image of the company and its Employees.



We act honestly (we don't cheat or take advantage of others).



We follow clear and fair rules that are familiar to everyone.



We are trustworthy and conscientious about our work.



We pay fairly and provide good working conditions.



We always tell the truth and make sure that the information we provide is reliable.



We keep our promises (I am reliable, trustworthy and I meet deadlines).



We are authentic and honest.



We behave towards others in a fair way and treat them the way we all want to be treated.



We treat others equally and respectfully.



We show respect the way we speak. We don't violate another person's dignity.



We appreciate other people's work and efforts.



Any criticism is shared directly with the person whom it concerns.



We respect other people's views.



We comply with the law and internal regulations and make sure they are followed.



We don't ignore any signs of disrespect around us.



We all co-create a good work environment.



We demonstrate a positive attitude.



We are polite and courteous
(language, tone, respectful behavior).



We are loyal; we trust other people.



We try to be understanding as to other
people's different opinions and strive for
compromise in all situations.



We respect our own and other
people's free time.



We understand other peoples'
needs for privacy.

WHAT ABOUT OUR CORE VALUES

What should we do?

Our core values are the foundation of our organization and guide us in our activities. At OKECHAMP, we are committed to live by these values in every aspect of our business, including our interactions with customers, employees, partners, and the wider community. This Code applies to all employees working within OKECHAMP. All rules, principles and guidelines are intended to be consistent with local laws and regulations. We must use common sense and think carefully through all our actions. At times we may encounter situations where the right choice is not clear, then ask yourself:

- Is it consistent with the Code?
- Is it ethical?
- Is it legally permissible?
- Will it put OKECHAMP and myself in a good light?
- Would I want to read about it in the media?
- Would my family and friends approve?

All questions must be answered "yes." If the answer to any of these questions is "no," don't do it. If in doubt, ask for help. You can talk to your immediate supervisor or a member of HR if you are uncomfortable talking to your supervisor. Or use the confidential or anonymous case reporting channels that operate within OKECHAMP.

A description of the channels can be found in appendix V.

Quality expectations of our managers:

All managers and other executives of OKECHAMP are expected to act as role models and be promoters of culture, ethics, values and compliance within their area of responsibility. This includes ensuring that the employees under his/her direction understand what their responsibilities are according to the Code. They should create a positive work environment where employees are encouraged and feel comfortable making reports and asking for help. If managers and other supervisors receive reports of a situation that is unethical or potentially damaging to the reputation of OKECHAMP should immediately notify the HR Department or use the confidential or anonymous case reporting channels that operate within OKECHAMP.

Where to go to if things go wrong?

If you have reason to believe that an employee of OKECHAMP or anyone performing work on behalf of OKECHAMP is involved in ethical or legal misconduct, you are required to report the incident immediately. You have the following options for reporting your concerns, to:

- The CEO;
- Your immediate supervisor;
- The HR Manager;
- The Integrity Counselor.

If you are a Dutch employee and you want to report misconduct or suspected misconduct that falls under the responsibility of the employer, please contact the confidential counselor for integrity. He can inform you about the further steps. The Whistleblowers scheme (010-PR-09) can offer a possible solution. See Appendix V for this.

Good work environment

OKECHAMP values the contribution of employees who identify potential issues that require our attention. We are committed to maintaining the confidentiality of reports, including the identity of the reporter. Retaliation against employees who report violations, breaches of the OKECHAMP Code, or any other illegal activity will not be tolerated, and we take such claims seriously. Any allegations of retaliation will be thoroughly investigated, and appropriate measures will be taken. All reports will be treated as confidential, and the personal data of the reporting person will be protected in accordance with applicable laws. Reports may be submitted anonymously, and the company ensures protection against any form of retaliation.



PRODUCT SAFETY AND QUALITY

Our top priority is to ensure that our customers can trust the safety and quality of our products. To achieve this, we comply with applicable food safety regulations and standards, and maintain strict hygiene and safety protocols across all our factories and workshops. If we detect any potential risks to product safety or quality, we promptly take corrective measures or escalate the issue to the CQO in Poland or the QESH manager in The Netherlands.



Quality control: We are committed to ensuring that our products are of the highest quality. All employees, contractors, and suppliers must take responsibility for ensuring that the products they produce, distribute, or supply meet our quality standards.



Product testing: We conduct rigorous testing to ensure that our products are safe and effective. All employees, contractors, and suppliers must support these efforts and provide any necessary data and documentation to facilitate testing.



Reporting of safety concerns: All employees, contractors, and suppliers must report any safety concerns or incidents to the appropriate authorities and to our company as soon as possible.



Continuous improvement: We are committed to continuously improving our product safety and quality standards. All employees, contractors, and suppliers must support these efforts and contribute to the development of new and improved safety and quality protocols.



Transparency and honesty: We believe in being transparent and honest about our products and their safety and quality. All employees, contractors, and suppliers must provide accurate and complete information about our products and processes.



Responsibility and accountability: We hold ourselves responsible for the safety and quality of our products. All employees, contractors, and suppliers must take responsibility for their work and be accountable for the safety and quality of the products they produce, distribute, or supply.



Food safety culture: We build and develop a food safety culture in which every employee understands their role in ensuring product quality and safety. We are all responsible for reporting risks, complying with procedures, and continuously improving the food safety management system.

GOOD WORK ENVIRONMENT

OKECHAMP is committed to building a positive, diversified and supportive workplace culture that values transparency and mutual respect. Our employees interact with each other in a dignified and respectful manner. We have zero tolerance for any form of harassment or discrimination among our staff. OKECHAMP also complies with the law regarding health and safety regulations.

Diversity

OKECHAMP regards the diversity of our employees as our most important asset, and every member of our team plays a vital role in our accomplishments. We are dedicated to offer equal employment opportunities to everyone and we embrace individual differences related to ethnicity, gender, language, education, etc. We acknowledge that diversity provides a foundation for creativity and innovation, which in turn will build a positive and dynamic workplace atmosphere.

Human Rights and Responsible Supply Chain

OKECHAMP respects human rights and is committed to conducting its business in a socially responsible manner. We do not tolerate forced labor, human trafficking, or any form of violation of employees' dignity.

We expect our suppliers and business partners to adhere to the same principles and to operate in accordance with international human rights and labor standards

Discrimination and harassment

At OKECHAMP, we strive to establish a workplace that is free from any kind of harassment. We have a zero-tolerance policy towards any behavior that interferes with an individual's job performance, undermines their dignity, or creates an intimidating, hostile, or offensive working environment. This includes any form of discrimination or harassment based on factors such as race, color, religion, gender, age, national origin, sexual orientation, marital status, political views, or disability.



Fair working conditions

OKECHAMP complies to all relevant laws and regulations pertaining to fair labor practices in every country where we conduct business, such as those related to employee compensation and benefits, child labor, forced labor, and freedom of association for political parties. We uphold a strong principle of not tolerating any form of unacceptable treatment of our employees at any of our facilities or operations.

Health and safety

OKECHAMP, as mentioned before, values our employees as our most important and valuable assets and we are dedicated to creating a secure and healthy work environment for everyone. Each employee plays a critical role in upholding this commitment by complying with all health and safety procedures and by ensuring a safe and healthy workplace. We expect all our staff to perform their duties without being impaired by any substance that could hinder their work. It is essential to report any workplace accidents, unsafe equipment, hazardous practices or conditions to the safety officer in Poland or QESH manager in Netherlands, which includes the use of alcohol, drugs and, in some cases, prescribed medication.



HONESTY, CONFLICTS OF INTEREST

Integrity: We conduct our business with the highest standards of honesty, ethics and compliance. We are committed to complying with all applicable laws and regulations and to maintaining the trust of our stakeholders through transparent and responsible business practices.

We must all avoid conflicts of interest at OKECHAMP. Such conflicts occur when personal interests or activities interfere or seem to be interfering with the duties we owe to our company. Even the most ethical person may be unconsciously influenced by a conflict of interest, and it may raise doubts about a partner's conduct or integrity. Here are some examples of situations that could give rise to conflicts of interest:

- Being employed by or running a firm, including consulting work, that does business with OKECHAMP, wants to do business with OKECHAMP or competes with OKECHAMP.
- Making a significant direct investment in such a firm, whether by yourself or by an immediate family member.
- Acting on behalf of anyone other than OKECHAMP in a transaction with our company, such as helping another entity in selling goods or services to OKECHAMP.
- Engaging in personal transactions that involve OKECHAMP's interests.

To maintain our continued success, we believe in fair competition and conducting business with integrity and in compliance with the law. We value trustworthy and mutually beneficial relationships with our customers, contractors, suppliers, and joint venture partners, and strive to understand their needs to develop our business. If there are any conflicts between local practices and OKECHAMP's standards of conduct, employees are encouraged to seek guidance from the HR department before taking any action.

Bribery and corruption

Bribery not only harms our group, but also the communities where we operate. Governments around the world are taking steps to combat bribery and many countries have specific laws against it. OKECHAMP has a zero-tolerance policy on bribery. This means that our employees are prohibited from giving or promising any undue advantage to any person in a position of trust, regardless of whether they work in the public or private sector. There are no exceptions for small amounts or so-called "facilitation" payments or "bribes". Additionally, OKECHAMP employees are prohibited from accepting or soliciting unlawful benefits.

The use of third parties by OKECHAMP employees to pay bribes or make "facilitation" payments or "kickbacks" is prohibited. Therefore, it is essential that our partners are informed of and committed to our anti-bribery and anti-corruption policies and that proper due diligence procedures are followed in selecting third parties.

Gifts, entertainment and favors

Business gifts and entertainment are a common practice and socially acceptable in many cultures. They can be used to establish and maintain good relationships in business. We must ensure that our gift and entertainment practices are reasonable and comply with OKECHAMP policies as well as local laws and regulations. It is important to remember that these courtesies should never be given or received to gain an unfair advantage, and their value must be modest, appropriate and they should be occasional. Any gifts, entertainment, or favors must be reported to the HR department to avoid misunderstandings.

Donations and sponsorships

OKECHAMP endorses specific donations to contribute to charitable causes and give back to the community. Additionally, OKECHAMP approves some business sponsorships to enhance its presence in the business community. However, some legitimate donations and sponsorships may be perceived as bribes or corruption under certain circumstances. Therefore, prior approval from the CEO is needed before considering donations or sponsorships that may give the appearance of bribery or corruption.

Political contributions

OKECHAMP strictly prohibits making any form of political contributions, including cash, donations of products or services, or purchasing tickets to fundraising events, anywhere in the world. However, OKECHAMP acknowledges the individual right of its employees to participate in the political process, provided that they make it clear that they are not acting on behalf of OKECHAMP.

Maintaining Fair Competition and Antitrust Compliance

OKECHAMP complies strictly with competition and antitrust laws in all countries where we operate. The Compliance Manual of OKECHAMP on competition law can be found in Appendix I of the Code. These laws ensure fair and free competition globally and prohibit anti-competitive practices, such as price fixing, market allocation, and bid rigging. OKECHAMP's employees are prohibited from engaging in such illegal activities. It is important to note that some competition laws, like the antitrust laws of the European Union or the United States, may apply to conduct outside the borders of the relevant country.



OKECHAMP obtains business-, customer- and supplier strategies, technology trends, proposed regulations and developments, and existing and anticipated actions of suppliers and competitors through expert opinions, industry sources, and other public sources. The company collects this information honestly and fairly, and never by questionable means such as theft, illegal entry, bribery, misrepresentation, or electronic eavesdropping.

Trade restrictions

OKECHAMP subjects export restrictions imposed by some European Union countries and the United Nations on transactions with specific countries, entities, and individuals. These restrictions prevent OKECHAMP from engaging in certain activities in certain countries, with certain entities or individuals. OKECHAMP does not enter into business relationships with companies excluded by governments. Non-compliance with these restrictions can result in severe penalties, including fines, revocation of export licenses, and imprisonment. OKECHAMP is committed to complying with all national and international laws and regulations concerning exports and embargoes.

Enforcement of contracts

OKECHAMP acts in good faith when entering into agreements and endeavors to fulfill all obligations under the contract. We also expect our business partners to act in the same way. We make every effort to fulfill our promises as agreed upon in the contract and send invoices in accordance with the agreed-upon terms.



Illegal trade

We do not engage in or assist with the illegal transportation or trade of items, substances, data, or individuals across international borders. If we become aware of any such attempts, we promptly report them to the CEO and relevant authorities.

Responsibility of Partners and Suppliers

We require all suppliers, subcontractors, and business partners to operate in accordance with ethical principles equivalent to those set out in this Code. Cooperation may be limited or terminated in the event of violations related to product safety, illegal employment, corruption, or breaches of human rights.

COMPETITIVENESS IN RELATION TO FINANCIAL INTEGRITY

OKECHAMP is dedicated to maintaining honest, accurate, and timely financial records and transactions. Our company strictly prohibits any action or omission that may conceal our financial activities from our stakeholders. It is mandatory for all OKECHAMP employees to comply with all relevant standards and regulations concerning financial accounting and reporting. We take our responsibility towards transparency seriously and expect all employees to do the same.

Financial Management

The completeness, accuracy, and comprehensibility of OKECHAMP's books, records, accounts, and financial statements are crucial. These records must be maintained in reasonable detail and in accordance with OKECHAMP internal control system. All financial transactions must be recorded properly and in a timely manner in the appropriate books. Prompt reporting enables early action by management. It is prohibited to have unrecorded or "off the books" funds, assets, or transactions.

Enhanced Responsibilities for Finance Directors and Managers

Those who are in charge of financial reporting, including finance directors, financial managers, and others, have an added duty to establish appropriate controls that guarantee truthful, accurate, complete, objective, consistent, timely, and comprehensible financial and management reporting.

Professional expenses and travel

It is essential to maintain accurate and timely documentation of all business-related expenses. Any uncertainty regarding the legitimacy of certain expenses should be addressed by consulting with the immediate supervisor or HR department before submitting a claim. The OKECHAMP Personnel Manual provides detailed guidelines for reference.

Combating money laundering

Money laundering is the act of disguising illegal funds by passing them through the financial system to make them appear legitimate. OKECHAMP recognizes the importance of complying with all laws and regulations designed to combat money laundering. Employees should exercise caution and good judgment when dealing with suspicious customers or vendors. We strictly prohibit, do not support, and will not facilitate money laundering.

SAFEGUARDING OF PRIVACY, CONFIDENTIALITY AND OTHER SENSITIVE INFORMATION

It is crucial for the success of OKECHAMP that we protect our physical assets and intellectual property. It is the duty of every employee to safeguard them. We must ensure responsible management of OKECHAMP and protect personal and proprietary data, whether it belongs to the organization, business partner, customer or employee.



Theft and fraud

OKECHAMP strictly prohibits theft, fraud, and any kind of misrepresentation or false statements. Fraudulent acts involve deliberate actions or omissions that deceive others and result in harm to the victim or benefit for the perpetrator. OKECHAMP employees are not allowed to intentionally misrepresent important facts, nor to encourage others to act based on inaccurate information. Misrepresentation may also occur through omissions or withholding of vital information, making other statements misleading.

Tangible assets and communication systems

All employees are responsible for safeguarding OKECHAMP's property and ensuring its efficient utilization. Such property should only be used for legitimate OKECHAMP business purposes. Proper and lawful use of OKECHAMP communication tools, including e-mail and internet, is required by all employees. Accessing, downloading, or distributing illicit or objectionable content that could potentially harm OKECHAMP's reputation is prohibited, so we must exercise care and professionalism in our communication practices, ensuring that our emails are appropriate and reflect OKECHAMP's values.

Corporate information and intellectual property

Any work product created by a partner for OKECHAMP, including inventions, ideas, software programs, artwork, trademarks, and confidential business information, belongs to the company. This applies if the work product is created during company time, as part of the partner's duties, or using company resources or information. Unauthorized use, disclosure, or dissemination of this information is prohibited and may result in penalties. Employees must maintain the confidentiality of the company's information entrusted to them, except when authorized in writing by the managing director or required by law. Before any work begins, an appropriate written agreement or release must be in place when OKECHAMP uses the service of outside consultants. It is essential to protect OKECHAMP's valuable brands, including the OKECHAMP

name, from abuse. When using the work product of others, such as software or copyrighted materials, partners should follow the rules and obtain valid licenses.

Retention of company data

OKECHAMP mandates that all employees comply with the company's internal policies and local regulations to maintain accurate and complete records. This responsibility extends to physical documents, such as contracts or files, as well as electronic data, including emails.



Data Protection

OKECHAMP is committed to protecting the privacy of its employees, business partners and customers. Personal data must be handled responsibly and in compliance with internal policies and applicable privacy laws. Any employee who handles personal data of others must follow OKECHAMP's internal policies and applicable laws. The collection, use, and processing of personal data must be for legitimate business purposes only. Access to personal data must be restricted to those with a legitimate business need, and measures must be taken to prevent unauthorized disclosure.

Cybersecurity and Protection of IT Systems

Employees are required to protect the company's IT systems against threats such as phishing, unauthorized access, malware, and data loss.

Sharing passwords and using unauthorized software or devices that may compromise information security are strictly prohibited.

ENVIRONMENTAL IMPACT

At our company, we recognize the importance of protecting the environment and we are committed to operating our business in a responsible and sustainable manner. We strive to minimize our environmental footprint and promote environmental ownership in all aspects of our operations.

We expect all employees to follow these principles and take responsibility for their impact on the environment:

- **Compliance with laws and regulations:** We will comply with all environmental laws and regulations applicable to our operations.
- **Pollution prevention:** We will strive to prevent pollution by minimizing waste generation, reducing emissions, and conserving natural resources.
- **Resource conservation:** We will conserve natural resources by using them efficiently and minimizing waste.
- **Energy conservation:** We will conserve energy by using energy-efficient technologies, reducing energy consumption and promoting renewable energy sources.
- **Sustainable practices:** We will promote sustainable practices in all aspects of our business, including product design, manufacturing, packaging, and transportation.
- **Continuous improvement:** We will continuously review and improve our environmental performance by setting and achieving goals and by regularly monitoring and reporting our progress.
- **Communication and training:** We will communicate our commitment to environmental ownership to our employees, customers, suppliers, and the public, and we will provide training and education to ensure that everyone understands their role in protecting the environment.
- **Stakeholder engagement:** We will engage with our stakeholders, including customers, suppliers, regulators, and communities, to understand their concerns and priorities and to work collaboratively to address environmental issues.

We believe that by adopting these principles, we can operate our business in a way that benefits both our company and the environment, and we expect all employees to uphold these standards in their daily work.

COMPLIANCE WITH THE CODE AND ACCOUNTABILITY

Any violation of this Code may result in disciplinary action, including a warning, termination of employment, or termination of cooperation with a business partner. In the event of suspected legal violations, the matter may be reported to the appropriate authorities.

APPENDIX I: COMPLIANCE MANUAL OF OKECHAMP

1) Introduction

The consequences of violations of European and Dutch and Polish competition rules are significant. Violation can lead to high fines, compensation actions from injured parties, negative publicity and damage the credibility of our company and the sector in which we operate.

OKECHAMP therefore opts with conviction for the following principle:

- OKECHAMP complies with competition rules without exceptions;
- OKECHAMP therefore asks its employees to strictly observe the competition rules.

2) The basic rules and sanctions of competition law

Competition law can be summarized in 5 basic rules:

2.1) Basic rule 1: Don't limit competition

As a basic principle, every company must be able to independently determine its industrial and commercial policy. Competition law prohibits any agreement or conduct that has the object or effect of restricting competition in the market. In other words, it is prohibited to (interfere with) free competition.

It is forbidden to participate in or involve OKECHAMP in anti-competitive agreements or conduct.

The following types of agreements between OKECHAMP and its competitors are prohibited:



Joint pricing: jointly fixing purchase or sales prices or restricting a trading partner's freedom to set its own prices.



Exchange of confidential information: exchanging confidential, strategic or competition-sensitive information regarding activities or commercial projects with a competitor.



Market or customer allocation: dividing territories or customers between OKECHAMP and competitors, agreeing that there will be no competition in certain territories or for certain customers.



Application of discriminatory terms.



Agreeing with a competitor to apply the same conditions in the relationship with (a) particular customer(s).

Form of agreement

An oral agreement is just as prohibited as a written agreement. Even a telephone conversation with a competitor or attending a meeting can constitute a prohibited agreement. The agreement may be secret (a classic "cartel") or may appear lawful, but what matters is whether the effects violate competition law.



Participating Parties

Competition rules apply: To all agreements between companies operating in a given market, regardless of whether they are competitors of each other. The rules also apply to distribution and supply agreements. To private companies as well as public companies, trade associations, associations of entrepreneurs and independent entrepreneurs.

2.2) Basic rule 2: Do not abuse a position of power

A company is in a dominant position if its position on a relevant market is such that, in principle, it does not have to take into account the behavior of its competitors or customers. Incidentally, having, pursuing or achieving a dominant position is not prohibited. What is prohibited is abusing it. Competition law prohibits any abuse of a dominant firm(s) in a given market. Abuse should directly be discussed with the Board. It is prohibited to participate in such practices or to involve OKECHAMP in them.

The competition authorities consider a market share of (normally) 40% in a given geographic area as an indication of a dominant position. However, a lower market share may already be sufficient for the existence of a dominant position if that market share is significantly higher than that of the other competitors.

Abuse of a dominant position may include:

- Imposing unequal or discriminatory conditions on different trading partners for equivalent performance;
- Imposing extremely high or unjustifiably low prices on customers or suppliers. With extremely low prices (below cost price), the dominant firm could force other competitors out of the market;
- Making the conclusion of agreements conditional on additional services unrelated to the subject matter of those agreements;
- Granting discounts and/or bonuses not justified on economic grounds to prevent customers from buying their supplies from competing suppliers;
- Imposing exclusivity clauses, regardless of their duration.

2.3) Basic Rule 3: Do's & Don'ts regarding the competitor

Never discuss prices or commercial terms with competitors

- Do not apply a common tariff or a tariff set in agreement with other competitors.
- In the presence of the competitor, avoid any subject of conversation that relates to the commercial or industrial policy of OKECHAMP such as rates or discounts, terms of sale, profits, margins, production and distribution costs or purchase offers.

If a competitor approaches you with competitively sensitive information, break off the conversation as soon as possible, by disconnecting or walking away if necessary. If the approach is in writing, refer the document to your supervisor or compliance officer of OKECHAMP as soon as possible.

Never accept a competitor's proposal to share the market among themselves

- An agreement between competitors to share or divide a market is a serious violation of competition law. Never agree with a competitor to keep a certain geographical area for OKECHAMP or for the competitor.
- It is also prohibited to agree to limit sales quantities to leave space for the competitor.

Never exchange information with the competitor regarding prices, volumes, sales conditions, market shares, production capacity

- Systematic exchange of sensitive information reduces uncertainty in the market. This is especially a risk in oligopolistic markets such as the canned mushroom market. Uncertainty is an important element of the degree of competition in each market.

Exercise caution when attending trade association meetings

- Do not participate in anti-competitive practices in the context of an industry association meeting visits. The same applies to other events where competitors are present;
- Inform your supervisor in advance;
- Attend meetings only with a precise agenda of topics to be discussed;
- Leave the meeting when (in your opinion) illegal matters are being discussed (better safe than sorry);
- Report competition incidents to your supervisor or the compliance officer.

2.4) Basic rule 4: Leniency program

Both national and European competition authorities have established leniency programs. These schemes allow companies that voluntarily report to the authorities a violation of competition law in which they themselves have a chance to benefit from full or partial immunity from fines imposed. These arrangements are effective: the majority of cases currently pending before the European Commission have come to light because one of the participating parties reported the violation. Any reports are always made by the compliance officer or management.



2.5) Basic Rule 5: Visit by the NMa or the European Commission

The following is a brief summary of the brochure "What to do if the NMa or the European Commission raids you."

Summary:

- In the event of a raid, immediately contact the compliance officer who will contact a lawyer
- Do not authorize the officials to do what they ask, but do not prevent them from doing their work
- Verify the identity of the investigators and the name of the agency on whose behalf they are visiting you. If they are raided by the European Commission, ask for a warrant or order authorizing them to investigate. Ask them to accurately explain the purpose of the investigation and write it down.
- Contact the person the investigators are asking about and try to delay the start of the investigation until a lawyer is present, but do not try to hold it up if the investigators indicate they do not want to wait.
- Accompany the investigators during their visit. Never leave them alone. Provide them with an empty meeting room.

You should:

- Present only documents related to the study.
- Do not produce documents between OKECHAMP and an attorney (correspondence and opinions, often identified by the bold text: confidential and privileged).
- Not to comply with requests from the investigators for clarification of the documents under investigation, unless in the presence of a lawyer,
- To keep a copy of the documents copied by the investigators.
- To remain polite to the investigators under all circumstances.

APPENDIX II: PROOF OF RECEIPT OF THE CODE OF CONDUCT OF OKECHAMP

I, the undersigned, _____,
declare that I have received and read a copy of OKECHAMP' s Code of Conduct.
I understand the Code of Conduct and will comply with it during my career with
OKECHAMP The Code of Conduct is published on the general drive of OKECHAMP and
may be amended from time to time. I understand that the published Code of Conduct is
the only valid version.

COC approved by the Board

Date

COC approved by HR

Date

Name employee:
(Please use capital letters)

Date: _____

Signature:

APPENDIX III: ETHICS & COMPLIANCE HELPLINE OKECHAMP B.V.

OKECHAMP B.V.

Chief Operations Officer (COO)

Frank van der Linden

M +31 (0)6 13 91 85 37

Frank.vanderLinden@okechamp.eu

OKECHAMP B.V. Confidential advisors on undesirable behavior

Fleur Daaderop (external)

M +31 (0)6 28 50 73 76

Fleur@o3.nu

In the Netherlands, violations of the Code of Conduct and the Code of Values can be reported through the following channels:

1. Telephone contact with the external confidential advisor appointed by Okechamp B.V. – Fleur Daalderop, tel. +31 (0)6 28 50 73 76
2. (Anonymous) contact with the House for Whistleblowers, in accordance with the House for Whistleblowers Act, tel. 088 – 133 10 00
3. (Anonymous) contact with the ASDA/Walmart Ethics Helpline, tel. 0800 – 318 405, e-mail: ASDAETHICS.CO.UK
4. All contacts are confidential. The reporting process is carried out by an independent third-party company acting on behalf of Asda. When reporting an issue related to Asda, the person receiving the report is informed so that the case can be linked and investigated.
5. The confidential advisor can: listen to your story, think along with you about the situation, provide information, give advice and support, and assist in filing complaints.

APPENDIX IV: ETHICS & COMPLIANCE HELPLINE OKECHAMP S.A IN RESTRUCTURING

OKECHAMP S.A. HR Director / Compliance Officer / Integrity Counselor

Małgorzata Drozdowska-Janicka

T +48 61 846 9931

M +48 509 998 738

malgorzata.janicka@okechamp.eu

OKECHAMP S.A. VALUE AMBASSADOR

Andrzej Siębor

T +48 61 444 4444

M +48 607 107 159

andrzej.siebor@okechamp.eu

In Poland, violations of the Code of Conduct and the Code of Values can be implemented through the following channels:

1. a phone call to the Ambassador
2. an e-mail message to the Ambassador
3. direct reporting
4. confidential or anonymous reporting through the reporting boxes located in the social areas of each location in Poland

APPENDIX V: RELEVANT HANDBOOK DOCUMENTS OKECHAMP B.V.

- 010-PR-07 Business Continuity Plan OKECHAMP B.V.
- 010-PR-09 Whistleblower scheme - Regulation dealing with suspected wrongdoing or irregularity
- HR-PR-04 Replacement Scheme
- HR-PR-14 Access Control Program
- HR-PR-17 Employee Security Policy
- Protocol ongewenste omgangsvormen

APPENDIX VI: RELEVANT HANDBOOK DOCUMENTS OKECHAMP S.A. IN RESTRUCTURING

- PHACCP-16 - Procedure for product recall from the market and crisis management and ensuring business continuity
- OKECHAMP S.A. in restructuring Code of Ethic
- Anti-harassment and discrimination procedure
- Standard protection of minors at OKECHAMP S.A. in restructuring
- Procedure for reporting additional and subsequent activities at OKECHAMP S.A. in restructuring