

# TERRAVITA's Code of Ethics



**terravita**



# Table of contents

1. Introduction
2. About the Company
3. Purpose of the Code of Ethics
4. Principles in business relations
5. Our foundations
6. Our principles and values
7. Managerial Staff and the Code of Ethics
8. Employee relations
9. Violations



# Dear Sir or Madam, Dear Partners,

I am honoured to present to you the Code of Ethics of Terravita Sp. z o.o., which sets out and defines the values and standards that guide us in our daily work at our Company.

This is our conscious declaration of conduct based on the highest standards, both in internal relations as well as when dealing with our contractors.

The Code of Ethics we have developed applies to every employee, regardless of their position, and is based on a common interpretation shared by all, which consists of honesty, respect for others, solidarity and commitment.

Every day, we operate in accordance with the provisions outlined in the Labour Code. This document defines the rights and obligations of all employees, regardless of the type of work they perform or the position they hold.

We strive to ensure that the document we have created lays the foundations for building a strong ethical culture throughout the organisation, and that its implementation strongly confirms that the company of which I am the Management Board President is a trustworthy business partner. The standards we have adopted are the golden rules of conduct for every employee, and putting them into words undoubtedly facilitates everyday professional decision-making.

We believe that the principles we adhere to will be respected by our business partners. We trust that our partners will also make every effort to ensure that their conduct is based on the highest ethical standards. We want as many entities as possible to pay attention to the aspect of honesty in their everyday business dealings. We sincerely hope that our policy will become a model for other companies, which will undoubtedly contribute to an increase in ethical conduct throughout the industry.



Iwona Łagodzińska

President of the Management Board

Terravita Sp. z o.o.



# About the Company

Terravita Sp. z o.o. is a company that was established in 1992. It is a strong manufacturer based in Wielkopolska, which has been associated with the heart of Wielkopolska – Poznań – since its inception.

Chocolate is the passion of the team of professionals at Terravita, who produce the finest bars, figurines and semi-finished products for the confectionery and ice cream industries out of their love for chocolate. The Company's goal is to manufacture high-quality products from the finest ingredients.

The Company currently manages several brands in the most important chocolate categories. It adapts to the traditional needs of chocolate lovers, but also keeps pace with the latest market trends. It is also strongly developing its portfolio of semi-finished confectionery products to meet the expectations and requirements of the industry.

The success of Terravita products on the Polish market has driven expansion into new international markets resulting in global recognition.



# Purpose of the Code of Ethics

Consumers of Terravita products, both retail and business, increasingly attach great importance to the standards introduced by the Company to ensure responsible production with care for people and the environment.

The Company strives to operate adhering to principles and standards rooted in ethical conduct. Thanks to these values, which have been implemented and developed over many years, Terravita's position is growing, which has a positive impact not only on business relationships but also employee well-being.

The Code of Ethics defines the rules of conduct for all Company employees who, upon joining the organisation, undertake to comply with these standards. These rules, grounded in honesty and social acceptability serve as a motivational and directional force for our actions.

This Code also sets out the framework and standards of conduct for employees and emphasises the need for each individual to assess whether their conduct in all areas actually contributes to strengthening Terravita's reputation as an honest and reliable partner or whether it exposes the Company's image to harm.

By signing an employment contract, each employee undertakes to comply with the provisions of this Code in both internal and external relations. The Company expects every person, entity and organisation cooperating with to adhere to the established principles and conduct their activities with high ethical standards.



# Principles in business relations

Terravita adheres to the highest standards in its business activities, both in its relations with employees as well as customers. The guiding principle is to fulfil both internal and external commitments to the Company's business partners.

Respect for trade secrets and protection of company assets are of paramount importance to the Company. Every day, employees take steps to ensure that the Company's image is maintained. Fair practices are also applied in relation to contractors, suppliers and all competitors.

An important aspect and, at the same time, a commitment to our customers is our absolute dedication to ensuring the highest quality of our brand's products.

The Company is socially conscious, cares about good relations with local communities, and is involved in activities aimed at protecting the environment. Employees participate in joint activities, getting involved in the social life of their community.

The Company's commitment to ethical actions in its daily business operations is a strong indicator of its dedication to its mission and a responsible approach to its work.

The following ideas guide the Company in its daily activities:

### *Keeping commitments*

Terravita fulfils all its obligations towards both its employees and contractors. The Company does not make empty promises, only declarations that it is able to fulfil.

### *Principles of cooperation and selection of contractors*

The Company prioritizes clear and transparent business and employee relations to prevent conflicts of interest. This refers to situations where an employee's personal connections may cause ambiguity. To avoid such cases, anyone with any doubts regarding the scope of cooperation should inform their superior and withdraw from the activity.

When an employee is unsure how to proceed in a situation, they should consult with their superior.



# TERRAVITA's Code of Ethics

Examples of situations in which a conflict of interest may arise:

1. An employee of the Company works directly with companies that they own or assigns tasks to employees of other companies with which they are related;
2. An employee directly supervises related individuals in the Company and also has the power to decide on their awards and bonuses;
3. An employee engages in activities or supports activities of other entities that may violate the Company's interests.

## *Gifts/Financial benefits*

Terravita has adopted a policy of not giving or accepting personal or financial benefits for the purpose of establishing or maintaining business relationships.

Permitted and acceptable gifts must adhere to applicable laws and regulations, be of a symbolic nature and be relevant to the donor's business.

When accepting a business gift, employees should ensure it aligns with established norms and doesn't create an obligation to reciprocate.

The Company strongly opposes all forms of corruption, including bribery, graft, embezzlement, donations or other financial benefits intended to obtain unlawful advantages.

## *Business hospitality*

Due to its numerous business contacts, Terravita frequently hosts guests and business partners. These meetings, both at the Company's headquarters and elsewhere, are conducted in accordance with the rules of etiquette and without excessive generosity, so that the invited guests do not feel uncomfortable. The Company practises modest meetings, and its representatives refrain from any displays of lavishness that could cause embarrassment to the invited guests or damage the company's reputation.

## *Fair competition rules*

The core principle in the Company's marketing activities is to be honest and engage in healthy competition. Advertising activities and communication are based on reliable, verified and honest information. Any attempts to mislead the Company's customers are absolutely unacceptable.

## *Relationships with suppliers*

Due to the nature of its business, the Company understands the importance of good relations with suppliers. It respects its contractors and suppliers, but also requires its partners to act in accordance with the law and good practices in various areas. Terravita also reserves the right to check whether its suppliers adhere to standards in the area of human rights, fair competition and environmental protection.



## TERRAVITA's Code of Ethics

Suppliers are chosen based on external procedures, ensuring that all eligible entities have a fair chance to compete and receive complete, reliable information through the process.

### *Product quality and safety*

Terravita spares no effort to ensure that all products are manufactured and stored to the highest standards.

### *Solidarity and social responsibility*

Terravita actively participates in the life of local communities. It is involved in sports initiatives that promote physical activity and healthy lifestyles, particularly for individuals who prioritize health. The Company cares about the environment. Modern production processes are incorporating technological solutions and high environmental standards aligning with the principles of sustainable development. Values and attitudes aimed at improving the environment in the immediate vicinity of the Company are consciously built.





# Our foundations

Friendly working conditions and mutual respect are values that significantly influence the structure and atmosphere of the workplace. The Company focuses on ethical conduct and respect for human rights. Each employee is required to adhere to all applicable laws and standards.

The Code of Ethics applies to all individuals employed by Terravita Sp. z o.o., regardless of the nature of their contract with the Company. Everyone has the same rights and obligations in terms of ethics and respect for human rights.

The concept of Terravita Sp. z o.o.'s operations focuses on the following elements within its structure:

- Flexibility – to meet its objectives, the Company is focusing on adapting to the FMCG industry general requirements and market trends. Thus, Terravita employees face the dual challenge of navigating new, evolving job demands while also actively pursuing their continuous professional development.
- Improvement – optimising systems and processes, through continuous improvement efforts, directly enhances employee potential and overall plant performance.
- Balance - Terravita Sp. z o.o. requires its employees to maintain a balance between work and private life. Goals, tasks and processes are carried out in such a way as to minimise work outside working hours.
- Respect for others - dialogue should be conducted maintain a high level of personal courtesy. When issues arise, employees work together to resolve them effectively and achieve the intended goal.
- Transparency – the Company emphasises honesty and transparency in its operations, recognising that these values are crucial for building customer trust and achieving success.



# Our principles and values

„There is nothing better than a friend, except a friend with chocolate.“

~ Linda Grayson, The Pickwick Papers

For almost 30 years, Terravita has been building its position in the industry. The Company's core values, which guide both internal operations and external business relationships, are shaped and upheld by the people within the organisation.

### *Respect*

Terravita firmly believes that respect for every individual is essential to the success of the entire company. For many years, the Company has consistently strived to create a friendly atmosphere and an environment free from unethical and discriminatory behaviour. Terravita ensures that the workplace is conducive to the professional development of every employee who is passionate about pursuing their career ambitions within the Company. The Company respects the right to privacy of both its employees and its contractors.

### *Honesty*

Every employee of the Company is obligated to comply with the law and act in accordance with applicable standards. Honesty builds trust both within the Company and among its customers. Conduct guided by good practices and ethical principles are the standards that the Company follows on a daily basis. Extensive marketing communication, including reliable advertising of Terravita products is based on honesty and truthfulness.

### *Responsibility*

Terravita takes the utmost care of its workplaces, and each employee performs their duties with the greatest commitment and respect for the property entrusted to them. Strict health and safety rules apply on the Company premises, and all employees undertake to comply. The Company prioritizes rigorous monitoring of its production process to ensure both consistent product availability, and, above all, of the highest quality standards.



# TERRAVITA's Code of Ethics

## *Solidarity*

Terravita treats all external support requests with care. It shows solidarity and compassion during difficult times and supports the ones most in need by joining aid campaigns. Thanks to these activities, the Company is fostering a collaborative environment where positive and responsible relationships are built.

## *Collaboration*

Teamwork is highly valued at Terravita. Sharing skills and experience is crucial for enhancing the quality of work. The Company is open to innovative ideas from all employees. Teamwork collaboration is the key to the Company's success.



# Managerial Staff and the Code of Ethics

Members of the Managerial staff (at various levels within departments) should set an example for others in terms of ethical conduct. Terravita's Code of Ethics is available on the website [www.terravita.pl](http://www.terravita.pl). The tasks of the Managerial Staff include:

- Providing subordinates with a friendly environment for carrying out projects and tasks.
- Motivating employees to achieve their goals.
- Providing helpful and ethical assistance and advice that effectively eliminates ethical dilemmas or other less pleasant situations.
- Receiving reports from employees that constitute evidence of violations of standards, procedures and codes adopted at the workplace.
- Reported situations should be analysed with the Ethics Officer/Complaints Committee and corrective measures should be implemented. Any worrying behaviour that could have negative consequences for Terravita Sp. z o.o. should be responded to.
- In situations where an employee reports potential wrongdoing, Managerial Staff has a responsibility to protect the reporting individual from any potential retaliation stemming from this report.



# Employee relations

### *Friendly working environment*

A key element for Terravita Sp. z o.o. is maintaining a positive atmosphere by cultivating relationships based on respect, tolerance and empathy.

The complexity of the Company's tasks involves the work of many departments. In order to meet the needs of its employees, the Company effectively ensures easy and efficient communication. Project deadlines are set in such a way as to maintain a balance between work and private life.

Terravita strives to strengthen bonds between employees. To this end, team-building meetings and various events are organised, including marathons and other types of team-building events. Participation in such events is always voluntary, and employees are not charged any fees.

Employee development is also an important issue. The Company organises training courses conducted by qualified professionals on an ongoing basis and according to the employees' needs. In addition to training, it also offers its employees free participation in seminars and lectures both in Poland and abroad.

### *Health and safety at work*

Health and safety at work are very important aspects directly related to the functioning of the plant. Employees comply with generally accepted requirements and regulations. Thanks to compliance with the law, tasks are performed in safe and hygienic working conditions. The plant is committed to continuously improving its health and safety operations. The Company's goal is to increase employee awareness and involvement in this area, as well as to train attitudes in the event of a real threat to health or life.

### *Multigenerationality*

Terravita employs people of all ages. Employees are eager to share their knowledge and experience, including technical and technological advancements. As a result, the plant combines tradition with modernity. Acquired synergistic effect has repeatedly shown that such solutions are conducive to process optimisation and increased efficiency.



# TERRAVITA's Code of Ethics

## *Communication*

Discussions with employees are a key element in achieving and continuously improving our goals. For this reason, Terravita actively promotes open and productive communication among its employees. Every conversation should be approached with respect, tolerance, empathy and active listening. The goal is to find a balance that maximizes benefits for the company.

## *Respect for human rights*

The Company is committed to valuing and respecting diverse cultures and religions. Terravita Sp. z o.o. does not discriminate against anyone because of appearance, origin, political views, membership in any groups or associations, skin colour, disability, age, gender or other aspects. The Company does not accept attitudes that could violate someone's dignity, including offensive and discriminatory behaviour. It also explicitly rejects attitudes that aim to lower employee self-esteem, engage in harassment or intimidation or foster an environment of non- acceptance. Terravita Sp. z o.o. emphasises respect for the dignity of others and personal culture. Regardless of their position, status or employment type, all employees should be treated with respect.

## *Gender equality*

Terravita promotes gender equality. There is no place for discrimination or unequal treatment at the Company. The Company does not have any specific preferences for senior or middle management positions. Everyone has equal opportunities in the recruitment process, training and career development. The Company is open to new ideas and improvement, regardless of whether they come from male or female employees. What counts is the result, commitment and respect for others. Both women and men are always included in the Company's internal teams.



## Violations

### Ethics Officer at Terravita

In order to establish basic standards of conduct in accordance with business ethics, the law and promoted ethical practices at Terravita, an Ethics Officer has been appointed. Their tasks include:

- Keeping the Code of Ethics up to date,
- Promoting the ideas of the Code of Ethics,
- Making sure the Code of Ethics is followed,
- Helping with communication and education to improve the Company's culture and to build ethical social relationships,
- Preventing conflicts arising from violations of the Code of Ethics,
- Providing ongoing assistance to employees in resolving issues related to ethical business conduct,
- Taking an independent position on the assessment of violations of applicable ethical standards and principles in the workplace,
- Encouraging employees to communicate openly,
- Informing employees about procedures for reporting actual or suspected violations of the Code or the law,
- Detecting and preventing violations of the provisions of the Code of Ethics or the law.

### *Reporting violations*

The Code provides a basis for ethical conduct, which has been developed and recognised by Terravita.

The Company acknowledges that even with established standards, deviations from the agreed-upon requirements can occur. In order to avoid conflicts and uncomfortable situations, one should seek the help of an immediate superior or the Ethics Officer. If one is concerned about potential reprisals, comments or complaints may be submitted anonymously by placing them in a special box designated for this purpose. To prevent a similar situation from occurring, corrective and improvement measures concerning the Code of Ethics should be implemented promptly. Any changes to the document are implemented by the Ethics Officer on an ongoing basis.

Every Terravita employee should report any instances of non-compliance with applicable standards in good faith (regardless of whether the situation directly affects them or not).



## TERRAVITA's Code of Ethics

The Company acknowledges that even with established norms, deviations from the agreed-upon requirements can occur. In order to avoid conflicts and uncomfortable situations, one should seek the help of an immediate superior or the Ethics Officer or the appointed Complaints Committee. If one is concerned about potential reprisals, comments or complaints may be submitted anonymously (including by contractors or customers) by placing them in a special box designated for this purpose (for employees only) or by sending them to the email address [kadry@terravita.pl](mailto:kadry@terravita.pl) (anyone).

Following an analysis of the problem and verification of violations against established requirements in the Company, the Ethics Officer, in collaboration with the Complaints Committee, takes necessary steps to implement corrective actions.

### *Protection of individuals reporting non-compliance or deviations from applicable standards*

During the investigation, individuals reporting non-compliance with applicable standards are guaranteed confidentiality of their identity. Until the allegations are confirmed, the individual concerned (suspected) is also protected. These measures are intended to prevent negative consequences for individuals connected to a specific situation.

Terravita explicitly prohibits retaliatory actions against individuals who report violations of standards. Any such retaliatory behaviour will be addressed separately, through disciplinary proceedings.

The Code of Ethics has been approved by the Management Board of Terravita Sp. z o.o. and is effective as of 29 November 2024.