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MESSAGE FROM YURIY KOSYUK, CHIEF EXECUTIVE OFFICER

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Yuriy Kosyuk, the founder
and CEO of MHP



MHP is a business built on trust – the trust of our employees, partners, consumers, and society. And this trust is impossible without clear approaches to daily operations, decision-making, and professional interactions.

We operate in a complex and dynamic environment where the speed of change and level of responsibility are constantly increasing. Therefore, it is crucial to establish a shared understanding of what is acceptable and what is not. We do not compromise on ethics, safety, respect for people, or integrity. It reflects both our principles and our position as a responsible business.

This Code of Ethics serves as a practical guideline to help each of us act with honesty, responsibility, and consistency in any situation,

regardless of the market, role, or circumstances.

Everything mentioned in it directly affects business sustainability, its reputation, and long-term development. It is also the foundation of our product quality, our partners' trust, and our impact on communities, the country, and the world.

At MHP, we believe that responsible business begins with personal commitment. It is no coincidence that responsibility is one of our values guiding us daily. I expect everyone to follow this Code and act accordingly, even in challenging situations.

Embed the Code of Ethics in your daily operations. This is how we together shape a trusted company both in Ukraine and globally.



ABOUT MHP



Who we are

MHP is an international company operating in the areas of food and agricultural technologies, a manufacturer of high-quality and delicious food products that improve consumers' lives. We operate in the areas of agriculture, production, processing, and manufacturing of food products.

Our production facilities are located in Ukraine, Spain, and South-Eastern Europe. We have established subsidiaries in the UK, UAE, Saudi Arabia, the Netherlands, and other EU countries. MHP shares are listed on the London Stock Exchange.

Our company unites over 39,000 employees in Ukraine and abroad; it is ranked among the top employers in Ukraine (according to Forbes).

MHP exports its products to more than 80 countries around the world. MHP agribusiness cultivates over 350,000 hectares of land in 12 regions of Ukraine, ensuring food security for the country and international markets by integrating modern technologies, sustainable production practices, and innovation.

Today, MHP in Ukraine is:

- No. 1 manufacturer of compound feed;
- No. 2 manufacturer of vegetable oil;
- No. 3 manufacturer of grain.



Market leader and a trusted employer

We are one of the largest taxpayers in the agricultural sector and one of the country's largest investors (according to Forbes, NV, and Liga.net).

MHP is a leading poultry producer in Europe, according to the WATTPoultry International ranking.

In cooperation with partners, we develop more than 15 food brands and several chains, including Miasomarket (MeatMarket) stores and Döner Market venues.

Together with MHP-Hromadi Charitable Foundation, our strategic partner, we support Ukrainians, develop communities, and preserve Ukrainian culture. We implement the MHP Poruch program to ensure individual support and comprehensive support for military personnel, veterans, and their families.

Yuriy Kosyuk, a Ukrainian businessman, is the founder and CEO of MHP.

MHP Brand Family



Perutnina Brand Family



UVESA Brand Family





During a full-scale war, MHP's role is to support Ukraine's economy and food security. During the full-scale invasion (2022–2025 inclusive) MHP Group paid UAH 28.5 billion in taxes to budgets of all levels.



MHP is recognized as one of the largest investors in the country (according to Forbes, NV, and Liga.net). During the full-scale invasion (2022–2025), the company invested more than UAH 26 billion in facilities and assets in Ukraine.



MHP contributes to food security in Ukraine and around the world, develops agricultural technologies, promotes efficient, innovative, and sustainable agricultural production, creates added value, and builds long-term partnerships with communities, government, and business. MHP's agribusiness unites 11 crop-producing enterprises, 3 feed mills, 17 grain storage elevators, and 31 livestock farms.



MHP focuses on manufacturing value-added products. This is more convenient for consumers as it allows them to invest time not in cooking but in something much more important. It is also more beneficial for the economy since value-added products can potentially increase the food industry's share of the country's GDP.



MHP has established multi-level control at all stages to ensure the high quality and safety of its products, from feed production and cultivation to the transportation of finished products to supermarket shelves and company points of sale.



What does this mean for you?

We are a company providing food products, operating stably, supporting the country's economy, building an ecosystem of responsible business, developing communities, and supporting military personnel and veterans. We want every person in our company to be proud to say: "I work at MHP."



THE CODE IS INTENDED TO:

- protect the interests of each employee;
- ensure transparency and integrity in relations;
- shape a culture of partnership, mutual assistance, respect, and trust;
- prove our responsibility to society, customers, and partners.

Why do we need this Code?

The MHP Code of Ethics and Business Conduct is our moral compass setting the principles of interaction, behavior, and professional culture in the company that unites more than 39,000 employees in Ukraine and abroad. The Code is publicly available and addressed to those interested in the company's activities and its way of doing business. It presents the methods MHP uses to implement its values and vision and also serves as a compass for ethical standards and their application.

We strive for everyone to understand that ethical behavior is not a mere formality but a conscious choice of professionals who are proud of their company.

Our Code is a flexible document. It is a reflection of our daily practices, actions, and commitment to improve.

The Code is part of the MHP Group's compliance system and is supplemented by internal policies and procedures to detail its provisions.

Who should follow the Code?

We are one MHP team, and our values unite us regardless of position or country.

The Code applies to all MHP employees, managers, officers, directors, and members of the Board of Directors, as applicable to their roles and responsibilities, regardless of their country of operation. It is intended to complement, and not replace, their statutory, fiduciary, and other duties. We believe that ethics and integrity are part of everything we do.

We expect our employees to adhere to our values. From our partners, we expect adherence to the Business Partner Code. Together, we shape a culture where everyone matters.

Violation of this Code may result in disciplinary action, including termination of employment or contractual relationships, as well as other liability under the legislation and the Company's internal policies.

Our goal is not just to follow the rules but to become a model of expertise and humanity.

We are MHP, we are united!

IN CASE OF ANY DOUBT:

- do not make a decision on your own if you are unsure which requirement applies;
- contact the Compliance team for advice;
- if necessary, consult the Legal or HR department.

REMEMBER: It is better to seek advice than to violate ethical standards due to ignorance. We are always here to answer your questions.



ETHICAL TIP

How should you act if the provisions of the MHP Code of Ethics differ from local laws or traditions?

We comply with the laws of the countries where we operate and the provisions of this Code. In case of any discrepancy with local laws, the requirements of the law apply. Where permitted by law, MHP may establish and apply higher ethical standards.

CULTURE TO WORK IN





DEAL^{SO}PHY

Values proven by actions

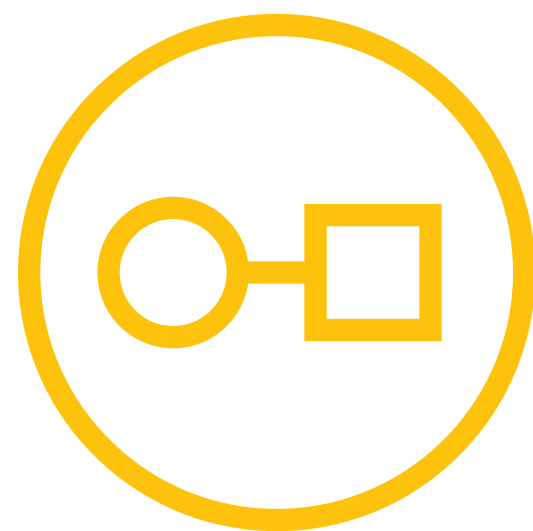
Our values

Why do I need company values?

- Values serve as a reference for decision-making. They help us to act in line with the company's standards, resolve disputes, and build trust and respect.
- Values unite. We feel more comfortable when working with people who share our views.
- When our values align with the company's ones, we often feel emotional satisfaction from our work, are more motivated and engaged, and find meaning in what we do.
- It is easier to build a career when the company's and employees' values align with our internal priorities.

VALUES THAT MAKE UP OUR DEALOSOPHY:

Dealosophy is the system of values by which MHP lives and works. It unites 5 key values of our company. At MHP, we don't just talk about values as our values are proven by actions. We are guided by them when making daily decisions. We use them as a reference point in every choice – from strategic decisions at the management level, to interaction between colleagues within the team, and cooperation with our partners.



PARTNERSHIP

We build sustainable partnership. Partnership is about working together to achieve mutually beneficial results, both within and outside the company. We are ready to listen and hear, to take an interest in each other's needs. We openly share information, experience, and resources to ensure that the overall result is greater than the sum of our individual results.

What we do:

1. We offer help when asked for assistance. If we are offered help in solving a problem, we see it as an opportunity for improvement.
2. In the relationships and interactions we are straight forward, we do understand and accept interests of our colleagues and make every effort to obtain a maximum result for the company's goals.
3. We acknowledge our colleagues' / partners good results and give constructive feedback.
4. When we see a colleague facing a problem, we proactively approach them, point it out, and offer help.
5. In collaboration, we treat each other as equals, synchronize the expectations of all involved parties, define each participant's role, and rely on each other's expertise.

What we don't do:

NEVER IGNORE requests for help or interpret offers of help as interference or criticism.

NEVER HIDE true intentions, never ignore the interests of others, and never prioritize personal gain over team results.

NEVER IGNORE the difficulties our colleagues face, and never wait until they ask – indifference is not our attitude.

NEVER UNDERVALUE the contribution and expertise of others.



GOAL-ORIENTATION

We always keep our goals in focus. We overcome the obstacles in our way and find opportunities for the most effective achievement of our goals.

What we do:

1. We set ambitious goals, we have answers to the question of why and we consider all possible options for achieving these goals, evaluating our resources.
2. We constantly update our goals, transform them if needed. If we realize that the goal is no longer relevant, we can abandon it or change it. All changes are discussed with the team and communicated clearly.
3. We do not stop, but overcome limitations to achieve our goals and find resources, pay attention to the details.
4. We involve our teams in the search for tools and methods to achieve our goals. We entrust them with the opportunity of choosing the ways to achieve their goals.
5. We formulate goals that align the interests of different departments and teams, creating a synergistic effect.

What we don't do:

WE NEVER HOLD ON TO IRRELEVANT GOALS just because "this is common practice." And we never change them tacitly, without discussion with the team.

WE NEVER GIVE UP AT THE FIRST DIFFICULTY; we never ignore details or waste energy on complaints.

WE NEVER ACHIEVE GOALS "AT ANY COST" and outside of partnership – we never ignore the needs of other colleagues, as a real breakthrough comes from synergy.

What we do:

1. We gain new knowledge and eagerly share it. We proactively exchange best practices and ideas between departments and with partners and implement them into the business.
2. We do not stop at what we have achieved and set new goals for personal development and the development of our team.
3. We experiment, draw conclusions from our mistakes and successes, and scale successful experiences.
4. We develop not just for the sake of development, but to increase our efficiency and achieve the company's goals.
5. We are open and ready for changes, we initiate and actively implement them.

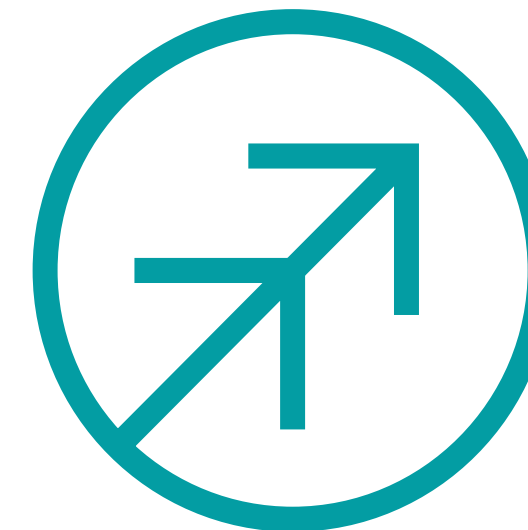
What we don't do:

WE NEVER KEEP KNOWLEDGE JUST FOR OURSELVES and always share it with others.

WE ARE NEVER AFRAID OF MISTAKES AND EXPERIMENTS, we never ignore the related consequences.

WE NEVER DEVELOP "FOR THE SAKE OF IT"; we never waste time on training that does not allow us to achieve results.

WE NEVER RESIST CHANGE and never wait for someone else to change anything.



CONTINUOUS DEVELOPMENT

We know that development is only possible through change. Therefore, we change ourselves and bring together those who are ready to change. We are open to transformations and innovation, and we continuously learn.

What we do:

1. We fulfil our commitments, keep our word and stick to it from beginning to end. We make arrangements in advance if changes are necessary.
2. We perform our tasks in good faith, and in the process, mutual trust is born' between us. We value the credence of others and do our best to ensure that nothing can sway it.
3. We make responsible decisions and evaluate all their consequences, understanding that every step we take is important and can impact not only the company's performance and employee and customer satisfaction but also the welfare and safety of the region and the state.
4. We acknowledge our mistakes and quickly correct them without blaming others. We analyse our mistakes to prevent them in the future, viewing them as gained experience.
5. When challenges arise, we look for opportunities and propose solutions rather than explaining why we cannot do it.

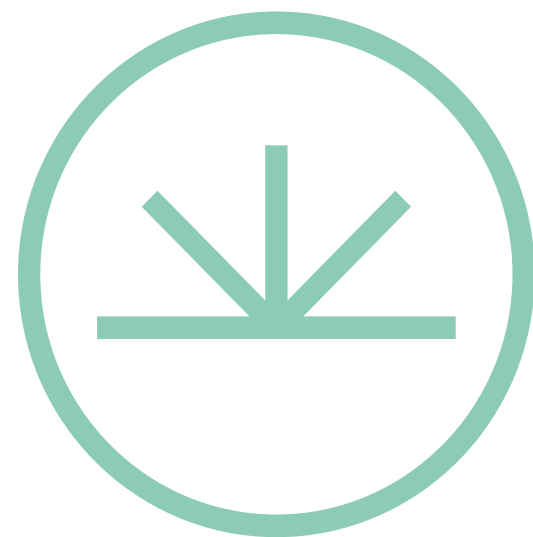
What we don't do:

- WE NEVER MAKE COMMITMENTS** that we do not plan to fulfill, and we never hide but explain when things go sideways.
- WE DO NOT FORMALLY ATTEND** to our duties, and we never compromise on the quality of our performance.
- WE NEVER SILENCE OUR MISTAKES,** we never look for the guilty party.
- WE NEVER EXPLAIN WHY WE CANNOT DO THINGS,** but look for ways to achieve the result.



RESPONSIBILITY

Act like an owner (for ourselves, with customers and with colleagues). We are responsible for the decisions we make and honour our agreements. When something goes wrong, we don't dwell on mistakes, but rather make efforts to find the right solution. We offer alternative approaches to solving problems when we see inefficient processes. We are conscientious about our work because we understand that the company's success depends on everyone's contribution.



TRANSPARENCY AND HONESTY

We are honest in our communication with one another. We initiate open discussions of problems, provide reasoned feedback, and are ready to accept it constructively.

What we do:

1. We openly share information when asked or if it could be useful to a colleague. The information that is provided is accepted with trust.
2. Emotions and needs are important to us in communication. We express our own while considering and respecting those of others.
3. We provide open, reasoned, and timely feedback, and we are ready to receive it constructively.
4. We do not manipulate information but communicate it to different people in the same way.
5. We initiate open discussions of problems and conflicts that arise, and we resolve them at our level. If necessary, we involve managers, informing each other in advance.

What we don't do:

WE NEVER HIDE INFORMATION that may be useful, and we never remain silent if we are asked directly.

WE NEVER DISTORT FACTS, never provide information on a case-by-case basis, and never share gossip.

WE NEVER UNDERVALUE EMOTIONS or needs and never say "ok" when we are not.

WE NEVER SILENCE CONFLICT and never "keep things in-house."

ETHICAL TIP

What should I do if I witness someone acting against our company values?

If you witness someone acting against our company values, you should:

- Try to talk to the person and explain what you have noticed, remind them of the company's values, and ask them about the reasons for their behavior.
- If the situation is repeated, if the behavior is causing financial/reputational damage to the company or affecting the team environment, you should report it to your management and HRBP. They may help you find the best solution to the issue. You may also report to the MHP Trust Line.
- Never discuss information about cases of your colleague's non-compliance with MHP values in private. This may only escalate the situation, cause misunderstandings or conflicts.



Values are our compass in daily routine, our internal guide in difficult situations, and our common language that unites thousands of people into a single team.

We all make choices every day — how to act, what to say, and how to react. It is MHP's values that help us make the choice responsibly, honestly, with respect for ourselves, the team, and the common cause.

We all shape the company's culture together. Both the team environment and the trust in MHP from employees, partners, customers, and society depend on our courage to speak openly, our willingness to support one another, take responsibility, and move forward.

Be an example of values! Act ethically! Choose wisely — even though it's a tough call. This is how we establish a company we can be proud of.

Human rights and respect in the workplace

1 Human rights

In all countries of operation, MHP acts responsibly, adheres to basic human rights, labor legislation, and international standards. Every employee — regardless of the country of their employment — has the right to decent working conditions, respect, equal opportunities, and safety.

MHP is guided by the following key documents and standards:

- the Constitution of Ukraine and the Labor Code of Ukraine (for Ukrainian companies within the Group);
- the UN Universal Declaration of Human Rights;
- the conventions and recommendations of the International Labour Organization (ILO);
- the European Social Charter (for EU members and associated states).

2 Respect in the workplace

MHP is committed to ensuring all our employees have a comfortable, safe, and respectful working environment in all countries where the company operates. Under local and international legislation, every employee has the right to be treated with dignity and to work without any harassment or bullying. MHP adheres to the principles of equality, the prohibition of unlawful discrimination, and zero tolerance for any form of misconduct, including intimidation, moral or physical pressure, hostile treatment, or offensive actions. We shape a culture of mutual respect and open dialogue, facilitating the professional development and well-being of our employees.

3 Diversity

We see diversity as a key factor to be successful and efficient, recognize the value of different skills, talents, expertise, and views of our employees.

The company never sets rigid quotas or obligations, as we believe that diversity should allow for the specific features of each business area.

We create an environment where everyone can unleash their potential regardless of race, age, gender, sexual orientation, religion, nationality, or other traits.

Our approach is aimed at developing talents, learning, growing, and attracting employees with diverse competencies to strengthen the team.

Human rights and respect in the workplace

4

Fair Employment

We adhere to the principles of fair, transparent, and impartial employment. All applicants are evaluated solely based on their professional skills, expertise, and competencies. We aim to provide equal opportunities for all employees and foster a culture of fairness and respect in hiring and future career development.

5

Gender equality

We support equal opportunities for all employees regardless of their sex, gender identity, or other individual traits. We aim to create an inclusive environment where everyone has equal rights and opportunities for career advancement. Ranking employees by gender or age is unacceptable. The company does not differentiate wages and social security based on gender.

6

Freedom of association

The Company recognizes and supports the right of employees to freedom of association and collective bargaining as part of respect for human rights under international standards. Employees have the right to lawfully and peacefully gather, establish, or join associations, and engage in collective bargaining to protect their labor rights and interests freely and of their own choice, without interference, pressure, or reprisals from the Company.

ETHICAL TIP

At the weekly meeting, the manager teasingly addresses a new colleague: "Iryna is not only good at finances but also graces the department!" The team laughs, but Iryna herself looks tense. In the hallway, she notes that she doesn't like it when people discuss her appearance at work. Someone says, "Don't exaggerate, it's nothing but a compliment!"

- Is there a difference between a compliment and a comment that causes discomfort?
- Is it acceptable to focus on the colleagues' appearances at work meetings?
- How can our words affect the team environment?

RESPONSE

At MHP, we value a culture of respect, where expertise is more important than stereotypes. Even a friendly joke or compliment can be unacceptable if it concerns appearance or has gender implications – especially if said in a public space. If a person feels uncomfortable, it is a red flag. We support open dialogue, but we also respect personal boundaries. You should always ask permission before giving a compliment or hugging a colleague. Sincerity and good intentions are not always interpreted the same way. Paying attention to the reactions of others is a sign of both expertise and empathy.



ZERO TOLERANCE FOR:



Human trafficking.

MHP takes a principled stand against all forms of human trafficking. It is a gross violation of human rights that is incompatible with our values, corporate ethics, and principles

of responsible business conduct.

We believe that no business result is worth the violation of human dignity. Counteracting human trafficking is our moral duty and responsibility as a global company.



Harassment and unacceptable behavior.

Any form of harassment, bullying, sexual intimidation, or other inappropriate behavior is unacceptable and inconsistent with our values.

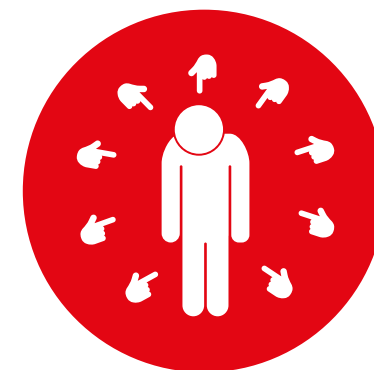
We have a zero-tolerance policy against insults, humiliation, and any form of aggressive or hostile behavior, whether in personal communication, online, or any other format.



Forced labor.

We strongly condemn all forms of forced labor. No employee may be forced to work under the threat of punishment, intimidation, or any other negative consequences.

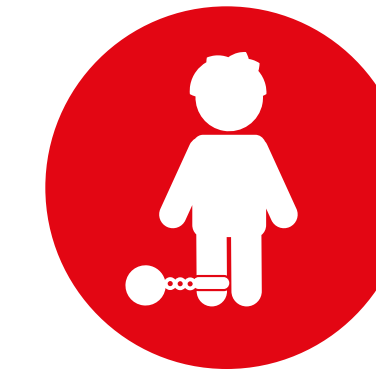
We adhere to the principle of voluntary employment and ensure every employee has the right to decent working conditions, freedom of choice, and respect for their rights under international standards and the legislation of the countries of our operations.



Discrimination.

We shape a culture of respect and equal opportunities. MHP does not tolerate any form of discrimination against employees or job applicants. We respect

the cultural differences, traditions, and features of all countries where we operate and create a working environment based on mutual respect, dignity, and equal opportunities.



Child labor.

MHP comprehensively complies with international human rights and labor standards. We support the principles of the International Labour Organization (ILO) Conventions,

the Labor Code, and other regulatory requirements of applicable legislation and international standards that regulate the involvement of minors in various activities, and therefore we never use child or forced labor to carry out any activities to achieve MHP's objectives.

Modern Slavery.

MHP has a zero-tolerance policy for modern slavery, including debt bondage, forced labor, document retention, restriction of freedom of movement, or other forms of exploitation. We are committed to identifying, preventing, and addressing risks of modern slavery in our own operations and supply chains. Therefore, we operate in line with international human rights standards and responsible business principles.

We expect the same commitment from our partners, suppliers, and contractors. Ensuring decent, safe, and legal working conditions is the basis for responsible business, regardless of country or context.



IF YOU OR ANY OF YOUR COLLEAGUES HAVE EXPERIENCED DISCRIMINATION OR PERSECUTION, PLEASE, REPORT IT TO THE TRUST LINE AT ONCE.

Health and safety in the workplace

At MHP, we believe that human life and health are the highest value. We comply with legal requirements in our operating countries and adopt best global practices to ensure that every employee returns home safe and sound.



We are committed to:

- ensuring safe and decent working conditions under international standards (including ISO 45001) and internal policies;
- identifying risks and implementing related preventive measures;
- providing employees with all necessary personal protective equipment;
- investigating incidents, sharing lessons learned, and implementing corrective actions;
- developing a culture of responsibility, conducting training, and encouraging safe behavior.

MHP complies with legal requirements and requires the same from all its partners and counterparties. We reserve the right to terminate cooperation with violators of safety requirements or those endangering people's lives. Managers are an example of compliance with labor protection standards. They are personally responsible for safe working conditions. Every employee has the right to refuse to perform an operation if there is a threat to their life or health, and is obliged to report risks, dangers, or incidents.

MHP has zero tolerance for:

- deliberate violation of safety rules;
- concealment of dangers, threats, or accidents;
- indifference to the life and health of colleagues.

Adherence to these principles is the basis of our ethical behavior, which strengthens the trust of our employees, partners, and society in all countries where we operate.

Rights and authorities of our employees

We respect the rights of our employees and authorize them to perform their duties.

We encourage open communication and feedback on issues related to the work environment and working conditions.



EVERY MHP EMPLOYEE HAS THE RIGHT AND DUTY:

- to know and comply with the legislation of the country, as well as MHP's internal policies and rules;
- to use personal protective equipment and follow safe work methods;
- to report any risks, dangerous situations, or incidents to the manager or the OHS department;
- to participate in the occupational health and safety training;
- to take care of their own health and ensure the safety of colleagues.



MHP PROHIBITS:

- starting operations without instructions or in violation of safety rules;
- ignore or conceal incidents and dangerous situations;
- fail to use protective equipment or use it incorrectly;
- perform tasks under the influence of alcohol, drugs, or medications that affect reaction;
- use faulty equipment or dangerous objects;
- violate fire safety, evacuation, or emergency response rules.

Employee relations, relations between employees and the company, managers and subordinates

↔ Employee relations

At MHP, we shape a culture of cooperation, respect, and trust. We promote open communication, teamwork, and mutual support. Each employee is responsible for establishing a safe, friendly, and psychologically comfortable environment free from discrimination, prejudice, or conflict.

↔ Between managers and subordinates

Managers are an example of ethical behavior and leadership. They should:

- exemplify compliance with this Code, ensure its implementation in their teams, and respond to reports of possible violations promptly;
- build trust within the team and promote open dialogue;
- support the professional development of employees;
- act fairly, showing no prejudice and manipulation;
- make decisions transparently and responsibly.

In turn, employees should:

- perform their duties with integrity and responsibility;
- take initiatives and be respectful to their colleagues and managers;
- openly ask questions or comment without fear of retaliation;
- report cases of unethical behavior or abuse of power.

↔ Between employees and the company

MHP and its employees bear mutual obligations. The company guarantees safe, fair working conditions and growth opportunities. In turn, employees are obliged to act honestly, responsibly, and in good faith and adhere to the company's ethical standards and values.



Protection of Company Assets

MHP assets are not merely property, equipment, or documents. They are the result of many years of work, investments, the trust of our partners, and the efforts of each employee. They are the foundation of our stability, competitiveness, and future. Therefore, asset protection is not only a duty but also a respect for the company, colleagues, and ourselves.

We care about the common things

We all contribute to the success of MHP. Equipment, transport, premises, electronics, materials, tools, and technologies belong to the company and at the same time are essential for our productive and safe work. We should use these resources responsibly, economically, and within their intended purpose. Never allow abuse, waste, or negligence. Our attitude towards the common things indicates our organizational maturity.

Information is one of the most valuable resources

Data is power in today's world. Commercial strategies, technological developments, employees' personal data, reporting, and corporate correspondence constitute confidential information to be protected.

We never share internal information with third parties. We never discuss internal company affairs outside the work environment. We never neglect cybersecurity. We comply with applicable laws and requirements relating to personal data protection, confidentiality, and information security. Violation of these principles is not simply a mistake but may cause harm to the entire company.

Protecting confidential information

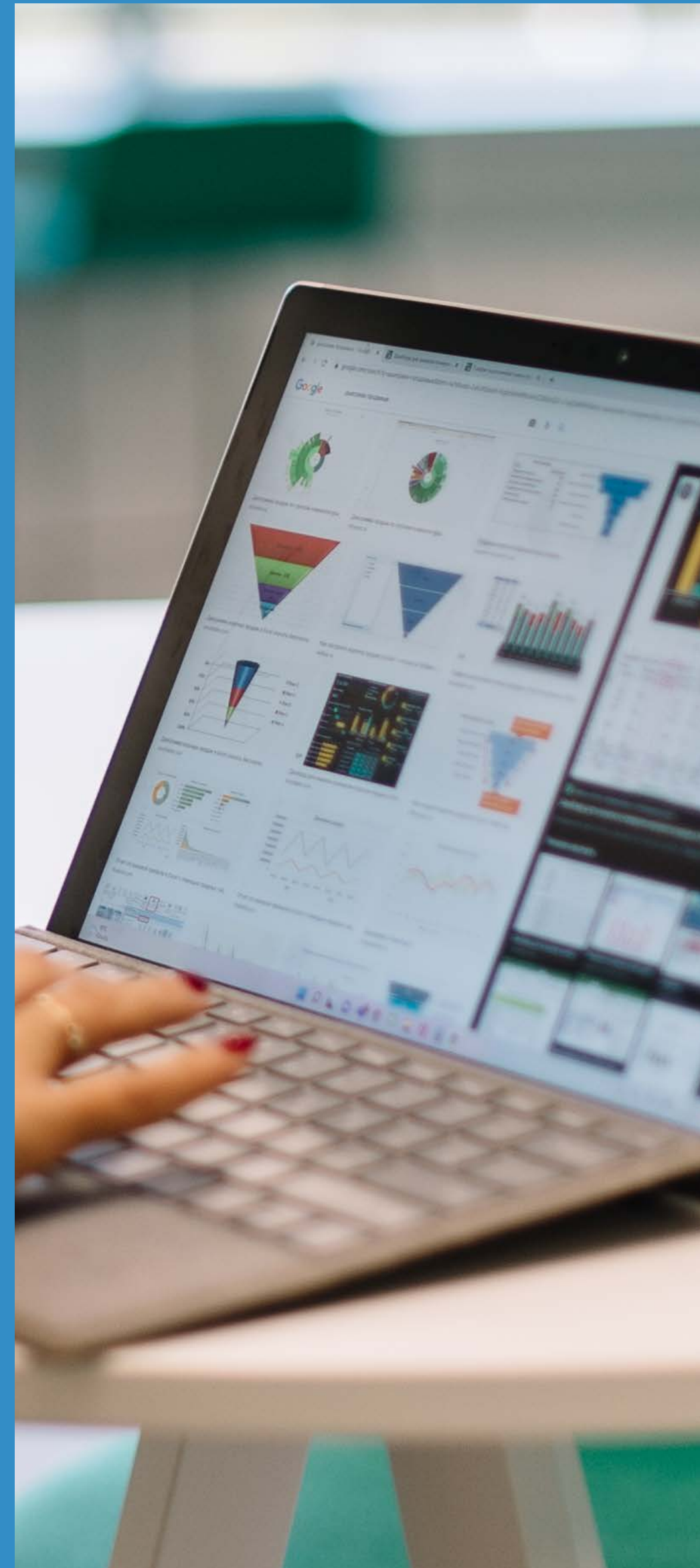
At MHP, we are responsible for the information we deal with. Confidential information is not merely company data, but also the trust of our partners, customers, and colleagues. Maintaining this trust is our shared responsibility.

DO YOU KNOW WHAT INFORMATION IS CONFIDENTIAL?

It is any internal or unpublished information about MHP, its employees, customers, suppliers, or other partners. An employee is granted access to such information exclusively within the scope of their job duties and should treat it with the maximum care.

Confidential information includes, in particular:

- business strategies, financial indicators, investment plans;
- marketing research, product developments, formulations;
- data about customers, suppliers, partners;
- personal data of employees or third parties (for example, full names, addresses, contacts, business information);
- any internal correspondence, documents, databases, access systems, voice messages, internal presentations, etc.

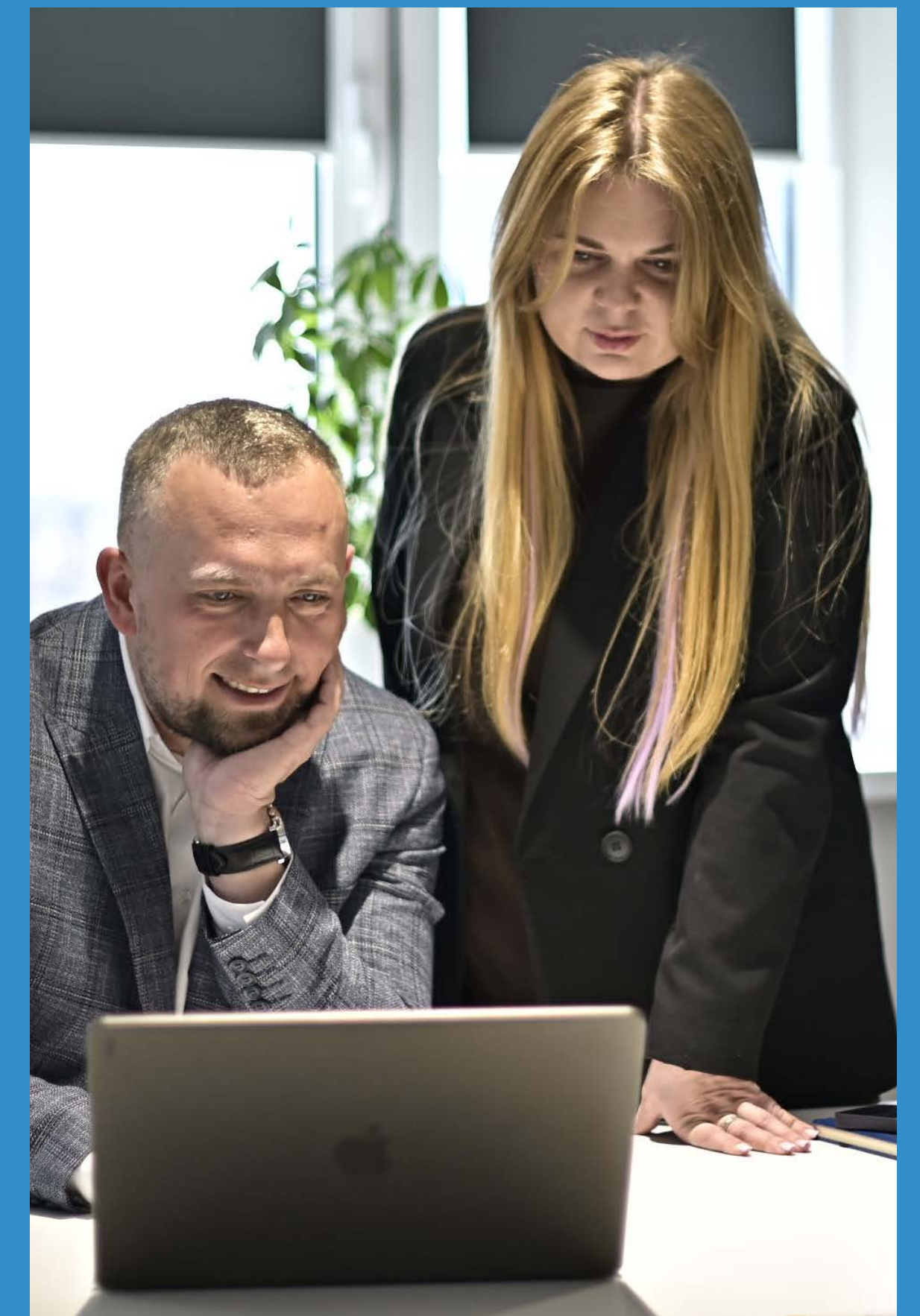


HOW WE PROTECT SUCH INFORMATION:

- We never share it with third parties without proper permission.
- We never discuss business issues in public or insecure places (transport, cafes, social media).
- We never leave work materials, documents, or devices unattended.
- We use reliable passwords, security and encryption systems.
- We respect confidentiality terms and conditions even when we are no longer employed by the company.
- We do not use confidential, personal, commercially sensitive, or other internal information in public or unauthorized AI tools.
- Before using AI tools, we make sure that their use is permitted under MHP's rules and does not create a risk of disclosing information or data.
- If we notice a suspicious message, an attempt to gain unauthorized access to information or systems, or a potential data leak, we

immediately report it to the relevant function.

One careless comment or forwarded document can cause financial damages, legal consequences, and loss of trust.



Intellectual property is the fruit of our minds

Ideas, know-how, documents, reports, and methodologies developed within our operations are the intellectual property of MHP. We respect each other's work and realize that the company's success depends on teamwork.

We never appropriate or disclose developments created at MHP, even after our termination of our employment.

Communications, caution in public

We communicate responsibly – both in MHP and externally. Every conversation, comment, or post may affect how people perceive our company. That said, it is crucial to be not only sincere but also consistent in our communication.

Internal communication supports a culture of trust and cooperation. External communication shapes reputation. Public speeches, interviews, and participation in events on behalf of MHP should be agreed upon with the communications department.

Social media is a communication tool that offers both opportunities and risks. We all have the right to express our own opinion, still we are responsible for the way our words affect the company's reputation.

Even outside of working hours, our actions can be associated with the Company, especially if our profile is public and features our position, the Company's name, or is related to our professional activities. We take responsibility for what we post on social media. We do not disclose non-public or confidential information, and we do not make statements on behalf of MHP without proper authorization. We respect our colleagues, customers, and partners, do not tolerate insults or humiliation, and uphold MHP's Values in our communications.



ETHICAL TIP

I was invited to speak at an industry forum as an expert. The topic is related to my work at MHP, and I even saw the company logo in the list of event partners. Can I speak there?

Solution:
Yes, but first you should contact the communications department, and colleagues will definitely help coordinate the messages. Even if you were personally invited, you should ensure that your speech does not represent the official position of the company without its consent.

RESPONSIBLE BUSINESS CONDUCT



Interaction with business partners

MHP establishes honest, long-term, and mutually beneficial relationships with suppliers, contractors, distributors, and other business partners who share our Values and adhere to high ethical standards.

We expect all MHP business partners to act in line with the principles of integrity, legality, respect for human rights, the UN Guiding Principles, labor standards, environmental responsibility, and anti-corruption policy.



Thus, MHP has developed a separate Business Partner Code, which all our counterparties should be familiar with.

We believe that ethical partnership is not a formal duty but the basis of trust, sustainability, and joint growth.





MHP product quality and safety: we guarantee high standards all the way – from field to table

At MHP, we believe that **quality depends on compliance with the rules in all areas of MHP's activities, proving everyone's personal responsibility to the consumer.** The quality and safety of our products are fundamental values and the foundation of trust for our customers and partners. We are proud to develop products that millions of Ukrainian families and consumers in over 80 countries globally choose daily.

Our principles. Vertical integration as a guarantee of quality

MHP's unique business model of vertical integration allows us to control the entire production chain, from growing grain and oilseeds for feed to delivering finished products to retail chains. We own all stages of production, which allows us to ensure the highest standards of quality and safety at each step.

Innovation and quality control

We continuously invest in modern technologies and innovations to increase production efficiency and ensure product safety. Our laboratories are equipped with cutting-edge devices to ensure comprehensive quality control. All product batches undergo thorough and multi-level control before being shipped to consumers.

International standards and certification

MHP's activities are regularly verified via numerous audits and inspections (both Ukrainian and international), namely, for compliance of quality and product safety management systems with the requirements of the legislation and individual industry standards.

Audits cover all key stages of production, from growing and feeding to processing and manufacturing finished products. They are conducted annually by accredited certification bodies.

The holding's enterprises are audited for compliance with international standards BRCGS Food Safety, FSSC 22000, and ISO 22000, which establish requirements for quality and product safety management systems, production process control, hygiene, traceability, risk management, etc. Poultry farming processes are also audited under the GLOBAL S.L.P. IFM standard, feed production – under the requirements of GLOBALG.A.P. CFM, oils – BRCGS Food Safety and GMP+ FSA, and individual production processes are certified according to HALAL and KOSHER standards.

MHP is also certified under leading international standards, including ISO 39001 (Road Safety Management System), ISO 14001 (Environmental Management System), and ISCC (International Sustainability and Carbon Certification). The list of certifications is constantly expanding as we regularly improve processes and implement best international practices, striving for sustainable development and increased operational efficiency.

The quality of our daily decisions shapes product safety and consumer trust in the future. We create products we are proud of.



Interaction with public authorities and preventing bribery and corruption

MHP has a zero-tolerance policy to corruption and bribery in any form, regardless of the country of operation. It destroys trust, distorts competition, and negatively affects society. We never offer, give, or accept bribes or other improper types of benefits. We do not tolerate unofficial payments to simplify or accelerate formal, administrative, regulatory, or other procedures.

In our relations with public authorities, regulators, and officials, we are guided by the principles of legality, transparency, and expertise.

Fair Competition and Antitrust Law

MHP complies with the principles of fair competition and the requirements of antitrust laws in all countries where we operate.

Our principles:

- We compete fairly and independently and do not agree with competitors on prices, discounts, or other commercial terms.
- We do not divide markets, territories, customers, or suppliers with competitors.
- We do not agree with competitors on the terms of participation in or the outcomes of tenders or other competitive processes.
- We do not exchange information with competitors that may affect competition, including information about prices, commercial terms, customers, sales volumes, or business strategies.
- We do not abuse our position in the market or use our market power to unlawfully restrict competition.
- We comply with antitrust laws when interacting with competitors and participating in trade associations, industry events, and other professional organizations.



REMEMBER

Even an informal conversation with a competitor may create a risk of violating competition rules. If questions arise during a meeting, event, or other interaction regarding prices, customers, markets, tenders, or other competitively sensitive information, do not discuss them and seek advice from the relevant function.

If you become aware of a potential violation of competition rules, report it to the relevant function or use the MHP Trust Line.

Documentation and reporting

At MHP, we work honestly, openly, legally, and responsibly, as demonstrated by everything we record, sign, or report. Documentation is not a mere set of papers or files. It is a reflection of our actions, decisions, and mutual trust. MHP actively supports and implements electronic document management (EDM) as a modern, efficient, and secure tool.

Every employee of the holding is responsible for properly handling documents they access, especially regarding their intended use, preventing misuse, and ensuring the protection of confidential information. All paper and electronic documents must be used, stored, and destroyed in line with the current requirements of the legislation for document management.



Financial Integrity and Accuracy of Reporting

We ensure the accuracy, completeness, and reliability of MHP's accounting records, financial records, and other business records and reporting.

We do not tolerate falsification, concealment, manipulation, or intentional misrepresentation of financial, operational, or management information, data, or records.

All employees responsible for preparing, reviewing, or approving reports act in accordance with applicable laws, accounting standards, securities and listing requirements, and MHP's internal procedures.

We do not mislead auditors, regulatory authorities, investors, the Board of Directors, or other stakeholders, and we do not conceal information that may affect the accuracy of reporting or decision-making.

If we have concerns about the accuracy of financial or other reporting, accounting records, or the effectiveness of internal controls, we promptly report them to the responsible manager, relevant function, or through the Trust Line.



Conflict of Interest

At MHP, we value honesty and transparency in all decisions. A conflict of interest arises when personal, family, financial, or other interests may affect the objectivity of our decisions and the performance of our job duties.

A conflict of interest may be actual or potential. Such a situation may arise for any MHP employee, manager, officer, director, or member of the Board of Directors. It is important to identify a conflict in a timely manner, report it, and determine how it should be resolved.

A conflict of interest may arise if:

- you have another job, own a business, or serve as a director of another company, and this may affect your work at MHP;
- you or a member of your family work for or have a financial interest in a company that is an MHP supplier, customer, or competitor;
- a member of your family works for a company with which you interact on behalf of MHP;
- you participate in selecting

- a supplier, a procurement process, entering into a contract, or another decision that may benefit you, your family members, or other persons connected to you;
- through your work at MHP, you gain access to non-public information, a business contact, or a business opportunity that may be of interest to you, your family members, or a business connected to you.

Everyone is required to:

- upon joining MHP, report any actual or potential conflict of interest and declare it in accordance with the established MHP procedure;
- immediately report any new conflict of interest if it arises or becomes known to you during your employment;
- not participate in making a decision if it concerns your personal interests until the appropriate way of managing the conflict has been determined, and recuse yourself from the decision-making process;

- comply with MHP's established rules regarding the declaration and management of conflicts of interest.

MHP conducts an annual conflict of interest declaration process in accordance with its internal procedures. The annual declaration does not replace the obligation to report a new conflict of interest immediately after it arises or becomes known.

Transactions with related parties are carried out in accordance with applicable laws and MHP's internal rules.



REMEMBER

If you are unsure whether you have a conflict of interest, it is better to report the situation and seek advice. Open discussion helps avoid misunderstandings and supports honest and objective decision-making.

Gifts and Hospitality

We do not offer or accept gifts, hospitality, or other benefits that may affect the objectivity of our decisions, create a sense of obligation, or be perceived as an attempt to obtain an improper advantage.

Gifts and hospitality must be appropriate, lawful, transparent, and comply with MHP's established rules.

Value limits, prior approval requirements, declaration requirements, and other restrictions regarding gifts and hospitality may vary depending on the country and are established by the relevant MHP internal policies and procedures. Employees must comply with the requirements applicable in the country where they operate.



REMEMBER

if you are unsure whether you may accept or offer a gift or hospitality, do not make the decision on your own – contact the Compliance team.

Additional restrictions on gifts and hospitality apply when interacting with government officials, public officials, and representatives of government authorities, in accordance with applicable laws and MHP's internal rules.

ACCEPTABLE GIFTS:

- do not exceed the set limit;
- have fair value and are not luxury articles;
- do not give the impression that the person who presented a gift will later receive or has already received preferential treatment;
- are relevant and do not compromise the employee;
- do not pose any reputational risks;
- branded/souvenir products of the counterparty, whose value is less than the set limit;
- flowers, food products within the limit.

NON-ACCEPTABLE GIFTS:

- cash or its equivalent (securities, bullion, etc.);
- legally restricted goods, including those forbidden for free circulation on the market, as well as luxury articles;
- inappropriate gifts with obscene connotations;
- gifts having no direct monetary value (for example, a promise of employment);
- gifts intended to influence an employee or counterparty and/or induce them to act or refrain from acting.

ETHICAL TIP

What should you do if given a business gift that exceeds the set limit?

If an employee receives a business gift, whose value exceeds the limit set by internal rules or which may affect impartiality or create obligations, the employee is obliged to:

- 1** Refuse such a gift, thank the counterparty for it, and explain that such gifts are deemed unacceptable by company policy.
- 2** If unable to refuse, or the gift is received by mail, it is crucial to notify your immediate supervisor of the fact of receiving the gift promptly.
- 3** Refrain from any decisions regarding the donor (counterparty, supplier, contractor, etc.) until advice or a decision on further action.
- 4** Declare the gift. The gift will be returned to the supplier or donated to charity.



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REMEMBER

even a small gift may create a real or potential conflict of interest if it implies a sense of obligation or affects business impartiality.

Anti-money laundering policy

At MHP, we conduct business transparently, responsibly, and honestly. We never participate in any schemes related to money laundering, the financing of terrorism, or illegal activities.

How we act:

- We conduct due diligence on our business partners and assess the risks associated with our business relationships with them in accordance with MHP's established procedures..
- We conduct due diligence on new partners, especially in cases of complex financial schemes, unusual conditions, or counterparties from high-risk jurisdictions.
- We never agree to suspicious payments, as well as transactions lacking obvious economic content or purpose.
- We conduct all financial transactions transparently and in accordance with applicable laws and MHP's established procedures.
- We immediately report any suspicious transactions or signs of money laundering via the Trust Line, a manager, or a responsible expert.



REMEMBER

even if you are not sure whether a situation is a violation, it is recommended to contact the compliance department. Timely advice may protect you, the company, and our reputation.

International trade

As an international company exporting to over 80 countries, MHP strictly adheres to all requirements of international trade law, including sanctions regimes and export legislation.

Our principles:

- Compliance with international sanctions and embargoes
- Accurate declaration of goods and compliance with customs legislation
- Control over dual-use of goods and technologies
- Prevention of trade with terrorist organizations

Counterparty verification, including:

- Screening of all international partners under sanctions lists
- Verification of the end user of goods
- Verification of product compliance with export licenses
- Monitoring of changes in sanctions regimes

Insider Information and Securities Trading

MHP complies with applicable laws and stock exchange rules aimed at preventing insider trading and market abuse.

We do not use insider information to purchase or sell MHP securities or securities of other companies, nor do we disclose such information to other persons for the purpose of enabling them to trade in securities. Employees, managers, and other persons who have access to such information must keep it confidential and use it only within the scope of their job duties.

We comply with the trading restrictions established by the Company and do not trade in securities where such trading is prohibited by law or MHP's internal rules.

Specific requirements may apply to directors, officers, and employees who have access to insider information. Such persons must comply with the Company's procedures regarding securities trading and disclosure of information, including applicable closed periods.

REMEMBER

is not a limitation, but a competitive advantage. It establishes trust, reduces risks, and sets the basis for sustainable development.



Animal welfare

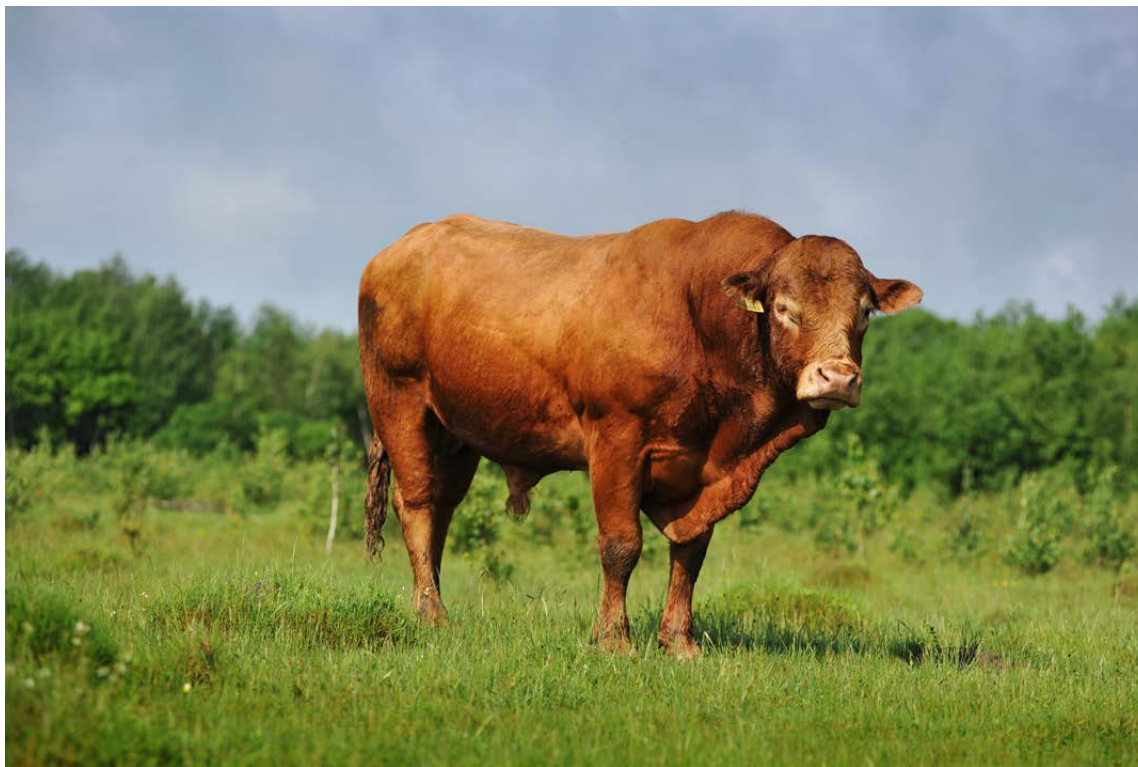
MHP defines animal welfare as its ethical obligation and an integral part of corporate responsibility. The company has implemented a corporate Animal Health and Welfare Policy, which sets out the principle of the “five freedoms” to be observed:

- freedom from hunger and thirst
- freedom from discomfort
- freedom from pain, injury, or disease
- freedom to express normal behavior
- freedom from fear and distress

MHP provides annual non-financial reporting on animal welfare and also regularly interacts with stakeholders in line with the Stakeholder Engagement Plan.

The company implements educational programs for employees, partners, and customers to shape principles of humane treatment of animals.

Compliance with the requirements for humane treatment of animals is ensured at all stages of production, including breeding, transportation, and slaughter.



SUSTAINABLE DEVELOPMENT



Environmental impact

MHP realizes the importance of sustainable development for both its operations and society as a whole. We aim to achieve strong economic performance while also enhancing social well-being and promoting environmental sustainability. The statement emphasizes a responsible approach to natural resources, supports social initiatives, and ensures high standards of living. In our operations, decisions, and tasks, we are guided by the 17 Sustainable Development Goals defined by the UN.



We implement environmentally responsible production practices, minimize environmental impact, and use natural resources rationally. We invest in the development of “green” technologies and energy efficiency. We comply with the laws of the countries where we operate and adhere to the Corporate Sustainable Environmental Policy.

THE COMPANY MESSAGE ON ENVIRONMENTAL IMPACT MANAGEMENT:

- we integrate the principles of sustainable development into all management and business decisions;
- we ensure compliance with the current environmental legislation of the countries where we operate and international standards;
- we regularly identify, monitor, and assess environmental impacts, risks, and opportunities;
- we develop and implement measures to prevent, reduce, or compensate for negative environmental impacts;
- we adhere to principles of preventing negative impacts and continuous improvement;
- we support environmentally responsible investments and technologies;
- we encourage our counterparties and partners to improve sustainable development practices;
- we ensure transparency when reporting environmental results and activities, including through public annual non-financial statements and communications with employees, communities, and other stakeholders.

We utilize modern technologies that enhance our efficiency in using energy and water while also minimizing harmful emissions and waste production. MHP adheres to international environmental standards, continuously improves sustainable farming methods, and introduces renewable energy; in particular, the company produces biofuels and uses other clean energy sources.

We pay special attention to waste management, which not only reduces our negative impact on the environment but also brings additional income through sorting, reuse, and sale of waste.

We regularly evaluate our activities for their impact on nature and improve our production processes to minimize harmful effects. We cooperate with local communities to ensure environmental safety and sustainable development in the regions where we operate.

Community development

MHP acknowledges its responsibility to the communities in regions where it operates and views them as key stakeholders. The company's activities may have both direct and indirect impact on the social, economic, and environmental situation of communities. Therefore, we adhere to the principles of transparent, fair, and inclusive interaction with local communities.

The Company implements approaches based on respect for human rights, the cultural identity of communities, and the principles of local self-government, in

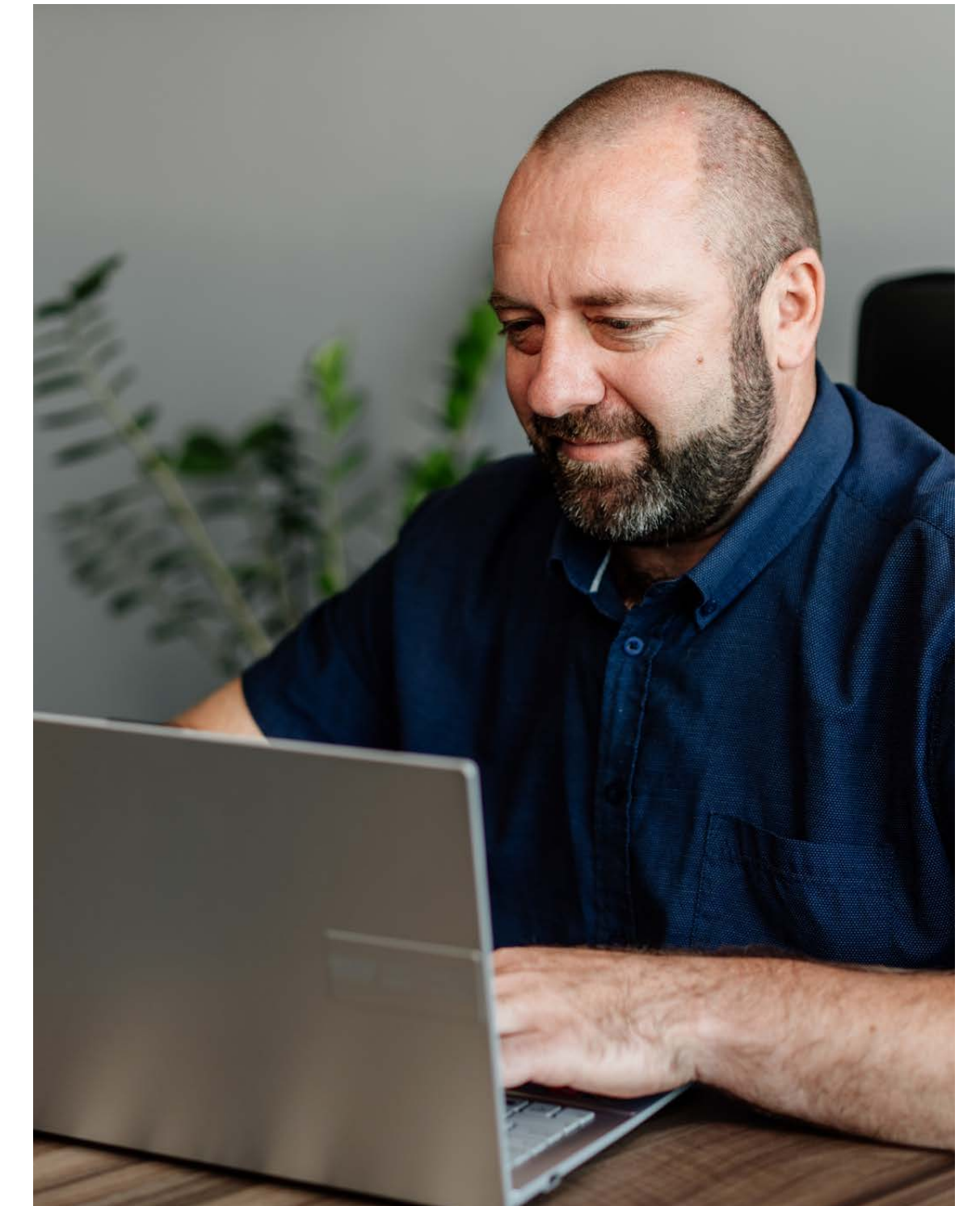
accordance with the UN Guiding Principles on Business and Human Rights, the Law of Ukraine "On Local Self-Government in Ukraine," and the European Charter of Local Self-Government, ratified by Ukraine. We acknowledge the autonomy of communities to make local decisions and support their capacity to shape a sustainable future.

MHP ensures open communication, regular consultations with community representatives, access to information, and feedback when implementing initiatives that may affect the population's well-being.

In its activities, MHP adheres to clear commitments to respect human rights in communities. In particular, the company:

- **guarantees equality and non-discrimination** via equal access to opportunities for all residents, regardless of their race, gender, age, or religion, nationality, social status, or disability;

- **creates safe and decent working conditions in line** with international standards, does not tolerate the use of child or forced labor either in its activities or by partners and contractors;
- **recognizes the right of communities to participate in decision-making processes** and provides regular consultations to consider the interests of the local population;
- **supports local initiatives** within corporate social responsibility, including the development of education, health care, and social services, support for entrepreneurship, and advanced training of local employees;
- **complies with international environmental standards** to minimize the impact of its production activities on the environment;
- **ensures transparency and accountability** through open communication with communities;
- **has established a system to address complaints and appeals**



from the local population, ensuring a prompt response to any reports of potential human rights violations.

While drafting a sustainable development strategy, the company is already implementing initiatives aimed at the development of local infrastructure, education, healthcare, culture, environmental safety, and civil society.



Social responsibility

MHP-Hromadi Charitable Foundation is a strategic partner of the Company to implement corporate social responsibility goals. It has been introducing changes in over 700 settlements in Ukraine for more than 10 years. The Foundation operates where support is highly needed, from frontline areas to the most remote villages of Ukraine, and consolidates the efforts of businesses, government, and communities. The Foundation is ranked among the TOP-20 largest charitable organizations in Ukraine (according to Forbes). Its priorities include support for military personnel, veterans, and their families within the MHP Poruch program, comprehensive community development, assistance to small and medium-sized businesses, and promotion of Ukrainian identity.

Main areas of activities:

- 1. Civil society development.** Strengthening communities by developing leaders and communities, promoting civil society organizations, and scaling partnerships between the community, businesses, and government.
- 2. Sustainable community development.** Comprehensive community development, infrastructure renovation, supporting small and medium-sized businesses, ensuring food security, developing healthcare and educational services, implementing the principles of diversity, equality, and inclusion.
- 3. Promotion of Ukrainian identity.** Restoration of our heritage and promotion of Ukrainian culture, support for the arts, development of educational and cultural programs for communities, state policy goals, and cultural diplomacy based on public-private partnership.
- 4. Support for military personnel, veterans, and their families.** Comprehensive and regular support for military personnel, veterans, and their families. Aid to military units, medical, psychological, and legal support for military personnel, veterans, and their families. The program is aimed at employees and residents of Ukrainian communities where MHP enterprises operate. It ensures support during service and after its termination. MHP retains jobs and pays wages to its mobilized employees to support the stability of their families.



REPORTING VIOLATIONS



At MHP, we shape a culture of trust, responsibility, and partnership. We believe that honesty and openness are the basis of our shared strengths. That said, we value people who are never indifferent when they notice anything that contradicts our principles.

Our Trust Line is a tool for everyone wishing to report possible violations, including employees, partners, suppliers, and members of the public. If you have encountered unethical behavior, corruption risks, discrimination, human rights violations, or other actions that negatively affect the company or its values, you may report them.

We are grateful to everyone who shares information. These reports allow us to change and become stronger.

We guarantee:

- **Confidentiality** – information relating to reports is handled with the utmost care.
- **The option to report anonymously** – you may choose not to disclose your identity.
- **Protection from retaliation** – we do not tolerate pressure, harassment, or other negative consequences for individuals who report potential violations in good faith.
- **Impartial review** – every report is reviewed objectively in accordance with established procedures.



REMEMBER

we never ask “Why did you do it?”
We say, “thank you for helping us become better.”

- **Proper documentation and feedback** – information and the results of the review are properly documented, and the reporter is provided with feedback on the outcome of the review in accordance with established procedures.
- **Escalation** – we treat every report with due attention and ensure that it is reviewed in accordance with established procedures. Where provided for by MHP’s internal documents, specific matters are escalated to the appropriate level of management, including the Compliance Committee and/or the Audit and Risk Committee.



Contact us openly
or anonymously by phone

7-4-77 or
+380 800 210 745
for calls from Ukraine, or

+380 914 810 645
for calls from other countries.



Or contact us online via the MHP website
<https://mhp.ethicontrol.com/web/en>

