

Farm Frites Poland SA

# CODE OF CONDUCT



potato processing industry



farm  
frites  
poland

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## Introduction

A foundation to Farm Frites Poland (FFP) business activities is the Integrated Management System which is based on the idea of sustainable development and social responsibility. In accordance with the System, we act in a responsible manner by caring about our employees, minimizing our environmental impact, as well as improving our management systems and responding to the needs of our environment.

**The Code of Conduct applies to all employees, regardless of their position, working hours, time and place of work.**

- It defines standards of conduct that should guide employees both in the workplace and in external affairs.
- The purpose of the Code is to help to make the right choices by identifying basic ethical standards and norms in our business activities and social relations.
- The Code does not extend the scope of regulations but collects fundamental principles from various regulations and statutes.
- Although the Code covers a wide range of policies and procedures, employees need to independently assess a given situation. When you have doubts about your behaviour or the behaviour of your co-workers, or if the Code does not provide sufficient guidance, you should consult your immediate superior or a member of the Ethics Commission for interpretation.

Each FFP employee must be familiar with the Code of Conduct and follow the guidelines outlined in the document.

We also expect our business partners, in particular our subcontractors and suppliers, to respect similar principles and values to those contained in the Code.

**Each FFP employee must be familiar with the Code of Conduct and follow the guidelines outlined in the document.**

## 1 Compliance with law

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In each area of its business activity, Farm Frites Poland is subject to laws, directives and other national, European Union and international regulations. We comply both with industry requirements and local regulations, as well as decisions issued by national, regional and local institutions.

Our employees are also required to comply with the national and local laws. The principles gathered in the Code of Conduct of FFP are applicable but are not above the law, which should be respected by every employee in the first place. In case of doubt, employees should contact their immediate superior.

# Mission and Values

What we do,  
we do well.  
What we do well,  
we can probably  
do better – TOGETHER.

## Our values

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- **OPENNESS** – we establish and maintain good relations with people and institutions we cooperate with. We are open to new solutions, ideas and opinions, even if we disagree with them. Creating a friendly workplace atmosphere for our employees, associates and visitors is of great importance to us.
- **RESPECT** – we take decisions and act with consideration to the dignity and rights of other people and entities. We treat our employees, business and social partners with respect. We respect the diversity of opinions and views.
- **RESPONSIBILITY** – we take responsibility of our actions and declarations towards each other, our clients, environment and the local community.
- **PROFESSIONALISM** – all our actions are based on knowledge and years of experience. We continually learn and improve our skills. We act with due diligence. We constantly search for new possibilities and solutions for production, environmental protection, as well as in the area of people management and relations with the local community.
- **COOPERATION** – we openly communicate with our co-workers, business partners and the local community by informing them about important activities of our company and by taking into account their opinions and suggestions.

# The Company and its Employees



## 1 Friendly workplace

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**With intention to create a friendly workplace where we enjoy working:**

- We build positive relations with our co-workers that are based on mutual respect, tolerance and high personal culture.
- Any form of harassment and physical, sexual, mental or verbal abuse is not tolerated.
- We do not tolerate behaviour and statements that violate personal rights of others and that lead to conflicts and disturb good workplace atmosphere.
- We do not use our position in the company for personal gain.
- We do not disseminate private or false information, or information that violates the dignity and good name of our co-workers.

**Relations with a supervisor are important for creating and maintaining a friendly workplace. Therefore, in relations with subordinates, supervisors at all levels are required to:**

- Keep appropriate distance.
- Treat subordinates as partners and individuals, based on objective and fair criteria.
- Issue commands that are clear, unambiguous and consistent with duties and power of a subordinate.
- Show confidence in skills and experience of a subordinate.
- Listen to subordinates, help them in resolving problems or direct them to a competent person.

- Support subordinates in handling professional problems and unexpected events.
- Address problems and concerns in private.
- Praise employees for their achievements, in private and in public.
- Inform subordinates about changes in regulations relating to their position and explain the changes.
- Keep subordinates informed about current plans, objectives and changes that might affect their position in the company.



## 2 Communication

**Effective communication, which is essential for proper operation of the company, is manifested by:**

- Executives understand the importance of two-way communication with employees in achieving business objectives, as well as in building good relations and friendly atmosphere.
- Every employee, regardless of position, has access to current information about the company to the extent necessary for his or her work.
- Every employee, regardless of position, has the right to information that might affect his or her work in the company.
- Channels for sharing information in the company need to be accessible for all employees, regardless of position.
- Information about the company can be communicated to the public only by its spokesman.
- We maintain good communication with external companies that we cooperate with.

**Effective communication**  
is essential for proper operation  
of the company.

### 3 Equal opportunities

for employment, promotion  
and professional development

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- Our employees and people applying for a job in the company are fairly evaluated, based only on their skills, professional competences and quality of work.
- No one is discriminated based on gender, age, nationality and beliefs.
- We do not employ minors and we do not accept forced labour.
- Every employee has the opportunity for professional development and improvement of his or her qualifications.
- We inform our employees about their responsibilities and expectations for a given post in a comprehensible way.
- We treat each other with respect regardless of position and seniority.
- We share our knowledge and professional experience with our employees.
- Decisions on promotion are taken with utmost care and based on substantive reasons.

**We treat each other  
with respect** regardless  
of position and seniority.

### 4 Health and safety

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**Health and safety of our employees and other persons present on the premises of the company is our priority. We constantly strive to improve the occupational safety level and care for health of our employees. We aim at complete elimination of accidents at work.**

- We remember that each of us is responsible for their own safety as well as safety of our co-workers.
- We act in accordance with the law and internal procedures, instructions and rules on health and safety for a given position.
- We use personal protective equipment required for a given position.
- During work we do not consume alcohol, take drugs and other intoxicants or work under their influence.
- We report all cases of health and safety violations, accidents, injuries and uncontrolled discharge of hazardous substances into the environment to appropriate people or entities.
- We aim at improving methods for identifying hazard, preventing accidents at work and occupational diseases.
- We know how to behave in emergency situations and we warn people in the hazardous area about the emergency.
- We improve qualifications of our employees on health and safety and encourage them to engage in activities that improve working conditions.



## 5 Protection of privacy, information and business secrecy

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**As part of the business, our company collects and stores information about its employees, clients, suppliers and other business partners. The data is collected only to the extent necessary for the business operation and is strictly protected.**

- We comply with all the rules and requirements on protection of privacy of our employees and business partners.
- We care about the information security of the company, employees and business partners.
- Confidential information is disclosed only to eligible persons.
- In case an unauthorized person gains access to sensitive information, we notify our superior immediately.
- Employees have the right to know what information about them is stored and to access their personal folders.

## 6 Financial records

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**We comply with the laws relating to keeping accounting records and we perform financial statements in a clear and transparent way.**

- We do not hide the actual status of transactions.
- We do not create false accounting records and we are audited by an external company every year.
- We store invoices and other financial documents in a safe way and for the period of time required by law.

## 7 Use of company time and property

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**Employees show their integrity by respecting company property, by using the company equipment for its intended purpose and by managing their work time efficiently.**

- We care for the company property and protect it from damage and theft.
- We do not use company property for personal gain.
- We protect intellectual property of our company.
- We do not disclose company secrets to any third parties.

## 8 Conflict of interests and competitive activities

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**A conflict of interests occurs when an employee acts against the interests of FFP while acting for his or her personal benefit, or the benefit of other person or entity he or she is liable towards, or when the behaviour prevents him or her from working effectively and objectively for FFP. To avoid conflict of interests and competitive activities:**

- Business decisions are made impartially, based solely on the interests of the company.
- We avoid situations at work where we could be accused of favouring immediate family members or relatives.
- We do not perform work or provide any consultancy services for our business partners or competitors.
- We inform our superiors about behaviour, or lack of reaction to behaviour, that constitute or could constitute a conflict of interest or competitive activities.

**Business decisions  
are made impartially,  
based solely on the interests  
of the company.**

## 9 Bribery and corruption

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**To prevent corruption we respect the following rules:**

- We do not offer or give bribes to our business partners. Small corporate gifts of low value are acceptable.
- We do not accept bribes from our business partners that could influence our business decisions. We accept only small gifts of low value.
- Any suspicion of corruption is reported to the immediate supervisor or a member of the Ethics Commission.



## 10 Behaviour outside the workplace

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**Farm Frites Poland does not interfere in private lives of its employees. However, our behaviour outside of workplace can have an adverse impact on the quality of our work and on the company image.**

- We remember that even outside of workplace we represent our company and therefore we should be working on maintaining the positive image of our company and avoid situations that could jeopardize its reputation.
- When talking about work-related subjects outside of workplace we present the company standpoint or clearly emphasize that the following is our private opinion.

## 11 Political commitment

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**The company does not engage in any political activities and does not encourage its employees to do so.**

However, every employee has the right to political commitment outside of workplace.



**The Company  
and its  
Environment**

# 1 Clients

**We are proud to be a producer of frozen potato products for global brands. We place great importance on maintaining good business relations and satisfactory cooperation with our clients and provide them with professional and reliable service. In relations with our clients:**

- We are committed to providing our clients with products that meet the highest quality standards and are safe for the clients.
- We provide professional and efficient service while being open to the expectations and comments of our clients.
- We provide sincere and complete information about our products, except from company secrets and information protected by law.
- We are responsible for our products and if there is a suspicion that a product does not meet the quality standards, we withdraw it from the market.
- We process complaints in a timely manner and keep the client informed about the progress of the process.
- We protect information gathered during cooperation with our clients.
- We fulfil orders in accordance with the contract terms.

We provide our clients  
**professional and reliable service.**



# 2 Business partners

**We find it important to build and maintain the image of a solid and reliable partner. We base our business relations on respect, trust, professionalism and long-term commitment. In cooperation with our business partners, including subcontractors and suppliers of potatoes, foil and packages:**

- We choose our suppliers on the basis of our internal requirements and procedures.
- We inform our business partners about our requirements and standards of conduct.
- When selecting suppliers, we identify any situation that might cause a conflict of interests.
- We rate our business partners fairly, based on clear and objective criteria.
- We respect payment deadlines and other obligations contained in a contract.
- Conflicts and disputes are resolved through dialogue.

### 3 Local community

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**FFP is located in Lębork and since it was established we stay closely connected with the local community. As we feel responsible for our actions, we make sure that any possible adverse impact is minimized, and positive is increased. We find activities for the benefit of the local community to be our duty, as well as privilege. In relations with the local community we apply the following rules:**

- We inform our community honestly and openly about the company activities that might affect the local area.
- We are sensitive for the needs of our community.
- We initiate and engage in events supporting our local community, especially in the area of sport, environmental protection and health prevention.



### 4 Natural environment

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**We feel responsible for continuous improvement of our production processes and other business activities to minimize and prevent negative impact on the environment. We want to meet the expectations of our clients by producing products that are safe for the environment, our employees and the local community. Our involvement in environmental protection is reflected in:**

- Complying with current applicable laws and norms on environmental protection.
- Sustainable and regulated waste management.
- Efficient consumption of utilities, such as water, energy and gas.
- Minimizing possibility of breakdowns and discharge of hazardous substances into the environment.
- Providing trainings and promoting environmental knowledge among our employees.
- Supporting and engaging in local environmental initiatives.

**Complying with current applicable laws and norms on environmental protection.**

## 5 Competition

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**We believe that all market participants have equal opportunities and should seek for clients on the basis of product quality and a fair price. In relation to our competitors:**

- We are respectful when speaking about our competitors, both in and outside of our company.
- We are open to cooperation in areas where it is possible.
- We do not engage in industrial espionage, theft or obtaining sensitive information by deception.
- We use only legal sources when researching information for comparison of our competitors product quality.



**Implementation  
of the Code  
of Conduct**

# 1 Awareness and availability of the Code

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**The Code has been developed for all Farm Frites Poland employees and needs to be respected by all of them, regardless of their position. Every employee must be familiar with the Code and follow its guidelines.**

## **Executives are responsible for:**

- Providing an example of behaviour compliant with the Code.
- Promoting the Code.
- Informing the subordinates and new employees about the provisions of the Code.
- Preventing violation of the Code.
- Reacting to behaviour violating provisions of the Code.

If any provision of the Code is unclear, an employee can ask the immediate superior or a member of the Ethics Commission for an explanation.

Also, any employee has the right to submit comments and suggestions for amendments in the Code. Those comments can be submitted to any member of the Ethics Commission, who will submit the proposal on the next meeting of the Commission and examine it for possible positive impact on the ethical culture of the company.

# 2 The Ethics Commission

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## **The Ethics Commission is required to:**

- Popularize the provisions of the Code of Conduct.
- Clarify any doubts about the Code.
- Accept suggestions for amendments in the Code from the employees.
- Examine reports of violation of the Code.

# 3 Reporting Code violation

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**All FFP employees and its stakeholders can report instances of violation of the Code.**

## **If it is certain that the Code has been violated, a person can:**

- Act independently to remedy the situation.
- Report the violation to the immediate superior or a member of the Ethics Commission. (If the problem can be resolved by the immediate superior, it does not have to be reported to the Ethics Commission.)

### **Violation of the Code can be reported to a member of the Ethics Commission through:**

- A meeting in person.
- An email to: [etyka@ffp.pl](mailto:etyka@ffp.pl).
- Posting a message that includes a signature and date to: Ethics Commission, Farm Frites Poland SA, Abrahama 13 Street, 84-300 Lębork.

### **Written reports, by post or email, need to contain:**

- Name and surname of the person being reported.
- The type of violation committed, the time and place of its occurrence.
- Any evidence of the violation.
- Information on whether it has previously been reported, and if so, what the outcome was.
- Information on how urgent is the report in terms of potential threat to life or health.
- Name, surname and contact details of the person reporting the violation.

Having received the report, a member of the Ethics Commission holds a meeting for the Ethics Commission. The Commission may investigate the issue independently or with the support of other people.

The Ethics Commission notifies the President and the CEO about the reports.

Reports are answered within 15 working days. In justified cases the time limit can be extended.



Anonymous reports of violation of the Code will not be addressed. A person reporting a violation is guaranteed confidentiality and protection of personal information.

Considering that a fake violation might be reported, personal information of a person whom the report concerns is also protected.

## **4 Final provisions**

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The Code of Conduct is available on our website [www.ffp.pl](http://www.ffp.pl), in intranet and by each member of the Ethics Commission.

The Code is available in Polish and English.

The Code was formulated based on Farm Frites Poland employees expectations and clients requirements.

Any violation of the Code will be treated as misconduct and may result in penalties provided for in the Work Regulations and other applicable laws.

The Code enters into force on the 15<sup>th</sup> of January 2017.



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