

CODE OF ETHICAL CONDUCT





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COMPANY VALUES

The principles all personnel of MHP holding company adhere to are the values which every employee of our company embraces and which promote sustainable development of MHP. This is a complex of directives, ideals and ethical perceptions that are the most important for the society, the team and every person. A certain set of values forms a modern, efficient work approach.

OUR VALUES

Motivation. The desire to grow, both professionally and personally, and gain new competencies is what makes a member of the MHP team different from people working at other companies. In turn, the holding company conducts a socially responsible activity, ensuring the wellbeing of its employees and promoting their development and efficient performance.

Ability for adaptation and improvement. In the fast-changing world of high technologies, specialists and workers must be equally able to easily adapt themselves to all innovations. On the other hand, our company as the industry's leader is continuously implementing the most advanced solutions.

Professionalism. Regardless of education and work experience, every employee must improve their skills day after day, mastering all nuances of their profession. And our company will provide all necessary conditions for that.

Orientation toward result. It doesn't matter for the MHP team how promising a project looked like while the work on it was in progress, if the ultimate goal has not been achieved. In this regard, every employee of our holding company must be able to formulate clear goals: in order to deliver a result, one has to know what to strive for.

Openness. Work of the entire holding company is based on the principles of transparency, and therefore, performance indicators of its enterprises are available to all stakeholders: employees, communities, public authorities, mass media, partners, investors, international and nongovernmental civic organizations.

OUR VISION

MHP is one of the global leaders of the agricultural market in the poultry farming sector. Our goal is to demonstrate sustainable economic, financial and operational growth thanks to the continuous improvement of our performance effectiveness and the quality of our products.

The foundation of our success is people, progressive business model, effective managerial decisions and advanced technologies.



MHP NORMS AND POLICIES

THE COMPANY'S NORMS AND POLICIES

MHP's activity is governed by Ukrainian law and by the norms and provisions regulating the areas of the holding company's activity. MHP Group companies also abide by laws of the countries where our company does business and by international norms and standards. Besides generally accepted norms, provisions and laws, MHP operates in accordance with internal regulations and policies, in particular, the Code of Ethical Conduct – a document regulating the relationship between MHP personnel and stakeholders while abiding by the company's principles and upholding the reputation of MHP. The Code of Ethical Conduct (the "Code") is a set of principles the adherence to which defines the behavior of every MHP employee.

PROVISIONS OF THE CODE OF ETHICAL BEHAVIOR

All employees of MHP are members of a single team who embrace the company's values and abide by the company's internal policies and regulations. The responsibility of every employee is based on the adherence to the Code of Ethical Conduct, the company's other policies and legislative provisions governing MHP's activity. The Code regulates decision making and business conduct of our personnel and defines our actions and policies, not limiting its applicability to the country where our head office is located. This document is binding upon all members of the MHP team, including the top management, the board of directors, subsidiaries, representative offices in other countries and consultants. The Code covers the most commonplace legal and ethical aspects, policies, processes, procedures, job responsibilities and working conditions which MHP stakeholders may have to deal with.

CONSEQUENCES OF VIOLATING THE CODE

Every MHP employee must abide by this Code, the company's internal policies, laws and international regulations when interacting with stakeholders or engaging in the activity related to MHP and reflecting upon our company's reputation. Any employee guilty of violating or failing to abide by the Code or other regulations will be subjected to a sanction depending on the nature of violation.

INTERNAL INVESTIGATION OF MISCONDUCT

Every instance of misconduct involving violation of law or the company's internal policies is thoroughly investigated. We look into every report of suspected misconduct and check it for credibility. If necessary, we do a comprehensive investigation in order to establish all circumstances of a violation and identify, document and prevent repetition of this situation. The company guarantees the protection of persons reporting a violation. It is the duty of every MHP employee to help with our investigation and provide complete and truthful information known to them. Anyone obstructing investigation or deliberately concealing evidence of misconduct will be subjected to a disciplinary action.



RIGHTS AND POWERS OF PERSONNEL

HUMAN RIGHTS

Every MHP employee shall observe the fundamental human rights and freedoms. The key documents our personnel shall abide by include the Constitution of Ukraine, the Code of Labor Laws of Ukraine, the Universal Declaration of Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization. Based on the provisions of these documents, MHP has developed a number of internal policies and rules that reflect the holding company's corporate values. Therefore, compliance with the [Personnel Policy](#), [Occupational Safety and Health Policy](#), [Corporate Social Responsibility Policy](#), and [Code of Ethical Conduct](#) is obligatory for all employees. These documents describe the rights, privileges and duties accorded to and performed by our personnel in accordance with MHP's corporate culture and sustainable development goals.

JOBS WITHOUT PERSECUTION

According to Ukrainian law, every citizen of our country has the right to be treated with respect and dignity and to work in the conditions without persecution. MHP abides by these principles, rooting out any forms of illegal discrimination of its employees featuring an unacceptable behavior, in particular, intimidation, persecution, hostile attitude or insulting actions directed at other employees.

CHILD AND FORCED LABOR

MHP abides by international conventions on the admittance of children to various types of work developed by the International Labor Organization, the Code of Labor Laws of Ukraine and other legislative documents regulating the admittance of minors to various types of work, and therefore, we do not use child or forced labor in any areas of our activity.

COMPLIANCE WITH LABOR LAWS

Our company complies with Ukrainian labor laws, in particular, the Code of Labor Laws that regulates labor relationships, duration of working hours, and wage payment terms and procedures.

OBSERVANCE OF GENDER EQUALITY PRINCIPLES

MHP observes the gender equality policy. Ranking employees by gender or age is unacceptable. The company does not differentiate wages and social benefits depending on gender.

FREEDOM OF ASSOCIATION

Every MHP employee has the right to join or not to join a labor union or create a recognized labor organization in accordance with Ukrainian law.

TOLERANCE AND RESPECT OF PERSONALITY

All MHP employees shall abide by the norms and principles of social morality. Every employee of our company must be treated as an individual with a certain set of personal values, moral qualities, professional competencies, knowledge, beliefs and an own worldview. Members of the MHP team shall be tolerant toward their fellow coworkers, appreciate and respect their opinion, and not express judgments regarding mental, physical or any other features of others. Our company tries to develop a corporate culture based on trust and openness of MHP to all stakeholders, improve microclimate within the employee team, promote development of personnel and retain talented employees at all levels while creating comfortable working conditions.

EQUAL EMPLOYMENT OPPORTUNITIES

Every person working at MHP is offered equal employment opportunities. All our employment decisions and career growth are based solely on personal competencies (skills, performance, abilities and qualification).



RIGHTS AND POWERS OF PERSONNEL

SAFE WORKING CONDITIONS

MHP values health and safety of everyone, and therefore, tries to minimize the instances of work-related injuries. We maintain work safety by observing the rules of conduct, eliminating incidents and risks of sustaining an injury in the workplace. We continuously improve our production processes and implement the latest solutions that help avoid injuries and accidents. In particular, we continuously keep statistics of work accidents to analyze them and take required corrective action.

Every MHP employee shall abide by the Labor Protection Law and the company's Occupational Safety and Health Policy. Any unsafe working conditions, threats or potentially dangerous actions/situations must be immediately reported to the company's officials responsible for occupational safety or to the management.

Continuous work safety analysis at MHP is a valuable instrument of enhancing the company's overall safety by identifying possible work-related threats for the purpose of developing an action plan to control or eliminate traumatism.

Besides safe working conditions, we take measures to avoid harm caused to employees by MHP's other employees or any third parties. Every employee shall be provided with safe working conditions without persecution/violence in the workplace. You shall never be involved in any actions that can cause harm to another person or make them feel threatened or in danger. Examples of violence in the workplace may include verbal or physical assault, threats, hostility, intimidation or aggression. In addition, false, malevolent or baseless accusations against another person may also be regarded as violence in the workplace.

All companies of MHP Group prohibit work in the condition of alcohol or drug intoxication, and taking any substances or medications that could adversely affect your work or pose risk to your safety and safety of others. All violations of the occupational safety rules must be reported to the Occupational Safety Department.

RIGHTS AND POWERS OF PERSONNEL

Every MHP employee having access to confidential information regarding other employees and/or business partners, including customers and suppliers, is required to keep this information confidential and not to disclose it to third parties. If confidential information concerning MHP or a business partner is essential and unavailable to the public, it cannot be used to make any decisions.

Examples of confidential information: the company's performance indicators, pricing information, sales turnovers, personnel wages, information regarding partners, suppliers or customers, etc.

Personnel Policy

Protection and safe labor policy



RULES OF USING THE COMPANY'S ASSETS

RULES OF USING THE COMPANY'S TANGIBLE AND INTANGIBLE ASSETS

MHP employees have access to the company's tangible and intangible assets, and shall use them for their intended purpose. Tangible assets include equipment, machinery, inventory, electronic devices, office equipment, etc. MHP assets may be used solely for the purposes of the holding company's activity, while caring about preserving their integrity and keeping them in a working order. Every employee shall use the company's assets in a manner that rules out their theft, loss, damage and misuse to help minimize the costs of improving/replacing these assets. Under agreement on material responsibility, materially responsible persons are obliged to ensure preservation of the company's assets.

Intangible assets include the company's time, confidential information, intellectual property, etc. The company takes all efforts to prevent fraudulent activity that could cause damage to MHP's reputation and result in dissemination of false information. For that purpose, MHP has the Ethical Control Department tasked with gathering and analyzing information regarding fraudulent actions, corruption and other offenses that cause damage to the company's interests, existing and potential partners or investors.

RULES OF USING CORPORATE DOCUMENTATION

Every employee bears responsibility for the proper handling of documents to which they have access, in particular, for their use according to the intended purpose, for avoiding abuse and ensuring confidentiality of information. All documents in paper and electronic form must be used, stored and destroyed in accordance with the applicable requirements to documentation management. The company's documents must be easily-accessible for personnel and duly protected against unauthorized access until destroyed. The persons responsible for access to confidential information are charged with the responsibility for the protection of this information.

In addition, you must remember about the procedures provided by Ukrainian law for the storage and destruction of documents pertaining to litigations, audits or investigations.



RELATIONSHIPS WITH BUSINESS PARTNERS



RELATIONSHIPS WITH PARTNERS

MHP is open to partnerships that are conformant with Ukrainian law and international acts and norms. Any partnerships of our company with other businesses are built on mutual trust, openness and readiness for a compromise in order to find the most efficient cooperation solutions.

When making business agreements, we take into account the needs and corporate values of our business partners by selecting mutually beneficial terms. MHP cares about protecting confidential information concerning its partners, and always has responsible attitude toward performance of its contractual obligations.

All companies of MHP Group abide by the principles of fair competition, maintaining their competitiveness by improving their performance indicators, preserving high product quality in accordance with ethical principles, and complying with law.

RELATIONSHIPS WITH SUPPLIERS

The process of selecting suppliers at our company is transparent, thanks to the implementation of the Electronic Auction System at all enterprises of MHP Group. We require our suppliers to respect human rights and abide by Ukrainian law and UN Guidelines. In addition, we do business with our suppliers on the basis of the same ethical norms which MHP abides by in its daily operations and which are laid down in our Code of Ethical Conduct, [Procurement Policy](#) and [Supplier Rules of Conduct](#), including:

- Animal protection
- Compliance with the anticorruption law
- Health and safety of personnel
- Environmental protection
- Human rights and freedoms
- Food safety and quality
- Corporate social responsibility



FAIR COMPETITION PRINCIPLES

MHP strictly abides by the rules of fair and transparent competition, complying with Ukrainian laws, in particular, the Law on the Protection of Economic Competition and the Law on the Protection against Unfair Competition. Any violation of these legislative acts may cause damage to the holding company's reputation and invoke application of sanctions provided by law.

Rules of doing business with suppliers:

- decisions on doing business with suppliers must be based on the results of a tender by evaluating the quality and price of proposed goods or services, the partner's integrity, etc.;
- avoiding unfair and fraudulent commercial practices;
- providing timely information regarding available procurement or sales programs;
- fulfilling contractual obligations, completely and in due time.

Rules of doing business with competitors:

- never make any deals with competitors regarding pricing or other terms of sale, coordination of tender offers, or assignment of customers, sales areas or product lines;
- never discuss information concerning the company outside the scope of an operation;
- honestly and transparently provide reasons behind your requirements to the company's and competitors' products;
- always use lawful methods of gaining competitor information;
- always maintain confidentiality of information and protect intellectual property rights.



CONFLICT OF INTERESTS AND BRIBING

CONFLICT OF INTERESTS

MHP employees cannot take advantage of their work at the company for personal benefit. Members of the MHP team must avoid conflicts of interests. The company has the Regulation on Conflicts of Interests that all employees must abide by. Every year, our key personnel are required to file a Declaration of the Absence of a Conflict of Interests. A conflict of interests occurs when personal interests (direct interest) or interests of family members (indirect interest) adversely affect the person's ability to perform his or her job duties or damage the company's interests. Even though MHP respects the right to personal interests and relationships, our employees are obligated to abide by the company's policies and avoid using their position at the company for personal benefit.

GIFTS AND RECEPTIONS

The exchange of gifts and organization of receptions and events with participation of our employees, partners and other stakeholders have the purpose of showing the company's openness and establishing contacts. Gifts and receptions are inappropriate if they create an obligation and prevent objective decisions or have the intention of expediting decisions.





CORPORATE SOCIAL RESPONSIBILITY

ENVIRONMENTAL PROTECTION

MHP minimizes its environmental impact while abiding by environmental protection laws and the Environmental Policy developed for the Group's enterprises.

Our environmental responsibility principles include compliance with environmental protection laws, systematic reduction of production and operating expenses related to environmental impact or loss of energy and resources, preventing environmental disasters and accidents, developing eco-friendliness and waste utilization. Every employee is required to abide by our company's Environmental Policy and care about the environment. In particular, environmental responsibility covers averting and reporting on potential environmental threats, and therefore, our employees must notify MHP Environmental Service or state inspectorates concerned about any violations, whether accidental or deliberate.

ANIMAL PROTECTION

We abide by the world's best standards on humane treatment of animals. MHP strictly complies with Ukrainian law and the Policy on Humane Treatment of Animals developed for the Group's animal breeding enterprises.

According to this document, all MHP enterprises and employees are required to ensure proper conditions for the maintenance of animals, high biosafety standards, balanced nutrition and fresh drinking water, disease prevention and timely medical treatment, continuous veterinary oversight and protection against suffering.

Abiding by the principles of humane treatment of animals, MHP takes care of the high quality and safety of its products, fulfilling its commitments to consumers, partners and other stakeholders.

Any violations of the animal treatment rules, whether accidental or deliberate, must be reported to responsible persons and departments concerned.

FOOD SAFETY AND QUALITY

The production of safe and quality food is of strategic importance for our company. MHP's products undergo multilevel controls, and all enterprises are required to confirm, every year, their conformity with food safety standards FSSC 22000, ISO 22000 and BRC Food based on HACCP (Hazard Analysis and Critical Control Points) and GMP principles.

Besides national and international food quality standards, MHP employees shall abide by the Food Quality and Safety Policy. The system of strict control over production process along the entire production chain is aimed at ensuring the highest quality of foods sold in the domestic market and for export.

Any actual or suspected violation, whether accidental or deliberate, must be immediately reported to responsible persons, because the safety and health of consumers depend on that.



CORPORATE SOCIAL RESPONSIBILITY

MEDIA RELATIONS

Mass media are some of MHP's stakeholders. They serve as an intermediary between our company and the public and as a channel for communication with other stakeholder groups, and therefore, our employees must provide mass media with credible and up-to-date information regarding MHP's activities for dissemination and communication to all stakeholders.

The company's relationship with mass media is regulated by Ukrainian law, international norms and MHP's internal documents: [Communication Policy](#) and [Corporate Social Responsibility Policy](#). These documents are binding upon all employees of the holding company. Mass media help MHP communicate with stakeholders using various social media instruments. However, if these instruments are misused or if information about our company is distorted or false, it may damage our company's reputation. To avoid situations like that, every employee representing our company must adhere to MHP's values when communicating via any mass media or social networks and reveal only the publicly accessible and truthful information. It is the duty of every member of the MHP team to prevent the disclosure of confidential information about our company, its partners, customers, etc.

COMBATING CORRUPTION

MHP has the policy of zero tolerance of any violations of law or the company's internal documents.

Our multilevel system of combating corruption is aimed mostly at preventing risks that may produce corruption. For that purpose, our company has the [Anticorruption Policy](#) binding upon all employees of the holding company.

Managers of all enterprises and security personnel are required to undergo regular anticorruption trainings to prevent the abuse on part of both the company's employees and stakeholders. These trainings review key adverse factors and cases (conditions that breed bribery, abuse of official capacity, etc.).

Integrity and transparency are the basis of MHP's sustainable development. Therefore, every employee of our company must comply with Ukrainian law and the company's internal documents, act in accordance with the company's values, and help maintain its good reputation depending on their job responsibilities.

SOCIAL RESPONSIBILITY

For MHP, corporate social responsibility is an unalienable part of our business. We strive for sustainable development, making investments and promoting food safety and environmental sustainability of cities, working on agricultural development, fighting climate change and its consequences, maintaining a partnership with communities, NGOs, business partners and charitable foundations to improve life in Ukraine's regions. MHP serves as an example for other large businesses of how to run a successful, socially responsible business and promote national development.

Working with stakeholders, our company abides by ethical principles, Ukrainian law and international norms. MHP builds the relationship with partners based on a dialogue to exchange information and take into account representative viewpoints, specifics and preferences of all parties to our cooperation. All project implementation decisions are made after a constructive dialogue and thorough analysis of all factors that do or could affect the outcome of these projects.

All personnel of our holding company work in accordance with the company's values, maintaining the common vector of sustainable development.



Contact us:
<https://mhp.ethicontrol.com>

