

Compliance Business Values and Principles

Südzucker Polska S.A. aims to compete successfully through innovation, quality, reliability and fairness. This entails complying with internal rules, as well as statutory regulations. A series of corporate compliance principles serve as a guideline. They highlight key issues that are very important in day-to-day practice. Südzucker Polska S.A. applies the laws currently in force and expects no less from its employees and business partners. The corporate principles list key items that are particularly important in practice:

- **Compete fairly**
Südzucker Polska S.A. is fully committed to compete fairly, and especially to comply with antitrust laws.
- **Integrity in business transactions**
Corruption is not tolerated. Gifts and invitations from suppliers must always be in reasonable proportion to the business relationship. Such gratuities require express approval from the respective supervisor. This applies to all employees who are part of any procurement process. The same principles apply in reverse to employees working in the various sales departments, in relation to our customers.
- **Sustainability principle**
Südzucker Polska S.A. is cognizant of its responsibility to protect the environment, as well as the health and safety of people inside and outside the company.
- **Compliance with food and agricultural industry laws**
Compliance with all relevant national, European and international laws - especially food and agricultural industry laws - is mandatory.
- **Ensuring equal opportunity in securities trading**
Every employee is obliged to treat confidentially any internal company information that could impact the company's share price on the stock market.
- **Proper documentation**
The company's internal control system requires that business processes be adequately documented. Audits must be conducted to ensure that the accounting-related information has been fully and correctly captured.

- **Proper and transparent financial reporting**
Südzucker Polska S.A. commits to providing open and transparent financial reports based on international accounting standards to ensure that all stakeholders are treated equally.
- **Fair and respectful working conditions**
Each employee is expected to be friendly and to treat colleagues and third parties fairly, professionally and respectfully. Discrimination and harassment of any type is not tolerated.
- **Protecting our knowledge advantage and respecting third-party protective rights**
Business secrets may not be passed on to third parties or published. The given protective rights of third parties shall be equally respected.
- **Separation of company and personal interests**
All employees must always separate their personal interests from those of the company. Only objective criteria shall be applied when making personnel decisions or conducting business with third parties.
- **Cooperative conduct with authorities**
Südzucker Polska S.A. strives to maintain an openly and cooperative relationship with all governing authorities. Information shall be provided completely, correctly, in a timely manner and in a comprehensible form.

Südzucker Polska S.A. offers its employees all necessary information sources as well as advisory service in order to avoid violation of laws and regulations. Any line manager has to organize the respective area in order to safeguard compliance with the Compliance Business Values and Principles, all other internal rules as well as laws. Compliance Officer in SZ AG and Compliance Officer in Südzucker Polska S.A. safeguard the contemporary information flow. Amongst others, they are responsible for training and investigation of compliance incidents. All employees are obliged to report violations of the Compliance Business Values and Principles to the Compliance Officer and the board of directors respectively.

Südzucker Polska S.A. Management Board
Wrocław, November 2014