

Supplier's Code of Conduct

1. Introduction

Boni Holding is dedicated to conducting business in an environmentally responsible, ethical, honest, transparent, and accountable manner. We have implemented measures to integrate these principles into our daily management practices.

We strive to be fair partners to our suppliers and stakeholders, continuously promoting lawful and ethical practices based on internationally recognized standards for human and labor rights, health, safety, and environmental care.

In order to maintain the sustainability of our supply chain, we ask our suppliers to uphold a similar standard of environmental and social governance. We are committed to working exclusively with suppliers who maintain high standards of corporate conduct and ensure their business partners do the same. We believe that by collaborating to create a more sustainable supply chain, we will strengthen our business relationships and add value to our companies and clients.

About the Company

Boni Holding is Bulgaria's largest pork producer and a key player in the food industry, supplying 30% of the country's fresh pork. The company primarily focuses on pig breeding and meat processing, complemented by its feed production operations, which support its breeding activities.

We operate seven pig farms for raising our livestock and have three feed production facilities dedicated to our animals. Our main meat processing center is situated in Lovech, featuring an industrial cutting house, a factory for production of salami and delicacies, and a factory for production of meat preparations (meat cuts, minced meats, raw sausages and semi-manufactured products; ready to eat/cook products). The close proximity of these three enterprises creates a highly efficient production complex.

Additionally, we have a unique facility for raw-cured products in Karlovo, known for its specialized microenvironment that imparts a distinctive flavor to our offerings. In 2021, we enhanced our business model by launching Bulgaria's most technologically advanced pig slaughterhouse in Targovishte, which plays a vital role in ensuring the high quality of our livestock throughout the meat processing chain.

Through our feed mills, pig farms, and meat production facilities, we ensure that our products meet the highest quality standards while contributing positively to the Bulgarian economy and society. Our mission is to provide Bulgarians with responsibly produced meat, ensuring care for people, animals, and the environment. To achieve this, we have set four strategic goals to shape the Company's development in the coming years and beyond:

- To increase the share of pork produced in Bulgaria in the consumption of Bulgarians (currently 2/3 of pork comes from Europe).
- To increasingly assert our leadership position and be the leading innovators in the meat industry.

- To respond to our customers' needs through scale and the ability to control more stages of production.
- To work to maintain the image of meat as a necessary food and to focus efforts in this direction.

2. Purpose

This Supplier's Code of Conduct is based on applicable international conventions regarding human rights and environmental protection such as the United Nations Guiding Principles on "Business and Human Rights" and the International Labor Organization's standards (ILO) as well as the best available practices. Therefore, the purpose of Boni Holding is to stimulate all our suppliers to aim towards compliance and adherence with the above-mentioned relevant regulations and goals.

3. Scope

This Supplier Code of Conduct applies to all direct suppliers of Boni Holding. For the purposes of this Supplier Code of Conduct, suppliers are divided into:

- Tier 1 – Suppliers that provide Boni Holding with essential resources—such as meat, feed components, and medical products—whose total annual supply value exceeds €1,000,000 within a calendar year.
- Tier 2 – Suppliers, whose annual total supplies to Boni Holding for a calendar year exceed € 500,000;
- Tier 3 – Suppliers, whose annual total supplies to Boni Holding for a calendar year do not exceed € 500,000.

4. Expected Supplier Behavior and Commitments

4.1. Forced Labor

We encourage and expect our suppliers and business partners to ensure that among their company's supply chain there will not be any occurrence of forced labor or slavery. Suppliers must not use or benefit from any form of forced labor, performed under threat of punishment, and for which workers have not voluntarily applied. Suppliers must be vigilant in identifying and addressing any form of modern slavery, including imprisonment or any other form of forced labor within their organizations and supply chains. Suppliers must ensure that employment is freely chosen and that there is no slavery, forced labor, or trafficking of workers. We expect our suppliers to protect all their employees' opportunity to terminate their employment relationship at any time willingly and in accordance with the applicable laws on the matter.

4.2. Child Labor

We ensure that child labor is not used in our operations and expect our suppliers and partners to comply with ILO principles regarding child labor. We expect that all our suppliers verify the age of potential employees with the aim to prevent the employment of children and of minors in any manner that is economically exploitative or is likely to be hazardous or to interfere with the children's education, or to be harmful to the children's health or physical, mental, spiritual, moral, or social development.

Additionally, we expect all our suppliers to adhere to the ILO conventions that define the minimum age for employment of children, as well as the applicable national laws in place of their operation.

4.3. Working Conditions

Our suppliers are expected to provide all necessary working conditions to their employees, adhering to national and international legal requirements and best practices. Suppliers must not violate the legal, labor, or social rights of their workers.

Workers must be employed according to established employment rules. Suppliers must provide weekly rest days, annual/national holiday leave, and all applicable leave entitlements for childcare, sick/medical reasons, or other statutory leaves as determined by the relevant legislation. Additionally, our suppliers must ensure that wages and related social security contributions are paid regularly and in full, and their workers receive the payments and leave entitlements provided by law.

4.4. Equal Remuneration

Our suppliers and partners are expected to ensure that within their companies there is no occurrence of unfair and biased remuneration discrimination based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, for work of equal value. We urge our suppliers to ensure that their employees' wages are evaluated fairly and in accordance with the national minimum wage legislation in place of their operation.

4.5. Freedom of Association

We encourage and expect our suppliers to ensure that there will not be any occurrence of limitation or violation of the right of employees to freedom of association and collective bargaining. Therefore, we expect all our suppliers to adhere to the ILO conventions that define and protect this social right, as well as the national legal framework in place of their operation. Suppliers must be understanding of the activities of trade unions and/or other worker organizations, in accordance with local legislation.

4.6. Fair and Equal Treatment

Boni Holding does not tolerate any form of bullying, unlawful harassment or intimidating, humiliating behavior. In turn, our suppliers are expected to provide a fair and respectful working environment, free from any form of harassment, discrimination, or behavior that

is considered degrading to employees. They must respect their employee's right to be treated without discrimination or bias based on gender, race, caste, skin color, disability, political convictions, family background, religion, age, pregnancy, or sexual orientation, in accordance with the ILO conventions and the national legal framework in place. Additionally, they must ensure equal opportunities for employment and work, without discrimination based on personal characteristics.

4.7. Occupational Health and Safety

Boni Holding expects its suppliers to provide a healthy and safe working environment, in accordance with the ILO conventions and the national legal framework in place, preventing any form of endangerment due to unsafe or unhealthy working conditions imposed upon employees. We expect our suppliers to take all necessary preventive measures against the occurrence of workplace accidents and injuries as well as perform regular training upon all their employees on the applicable health protection and safety measures regarding their scope of work.

4.8. Grievance Mechanism

We encourage our suppliers to ensure that an effective grievance mechanism is adopted among their companies in accordance with the national legal framework. The grievance mechanism must be made available to all individuals that might be affected by negative impacts occurring due to their line of work to address and resolve any misconduct.

4.9. Product Safety

The raw materials, goods, and services provided by our suppliers must comply with all applicable national and international laws and regulations regarding quality and safety and meet or exceed the relevant quality and safety standards. Boni Holding does not tolerate any deviations from these standards and expects full compliance at all times.

4.10. Environmental Protection

We assume that within our company's supply chain, there will be no instances of unlawful environmental practices that could result in ecological damage. Therefore, we expect our suppliers to monitor and minimize their harmful environmental impact, managing it responsibly while complying with the national legal framework in their areas of operation.

We urge our suppliers to commit to mindful resource consumption to reduce their environmental footprint, including emissions to air, water, and soil, as well as the use of materials, natural resources, and waste management, and take all necessary measures to monitor, minimize and strive to prevent environmental damage and continuously improve their environmental performance.

4.11. Animal Welfare

We presume that among our company's supply chain there will not be any occurrence of inhumane treatment of animals. Therefore, we urge our suppliers to ensure animal welfare within their own processes, aligning with the regulatory standards of animal welfare as mandated by EU and national legislation.

4.12. Antibiotics Use

We expect our meat suppliers to implement best practices that limit the use of antibiotics to therapeutic purposes only and enhance product quality and safety of meat products by ensuring minimized antibiotic residues. Additionally, we expect them to meet all regulatory standards aligning with EU and national regulations and guidelines regarding antibiotic use, ensuring regulatory compliance.

5. Selection of Suppliers

We require from our Tier 1 and 2 suppliers to accept Boni Holding's Supplier's Code of Conduct when renewing or entering in contractual relations as well as to provide certain information, which will allow us to assess their commitment and performance in respect of the protection of human rights and the environment. We may include further contractual requirements related to the topics above when signing agreements with such suppliers. Boni Holding reserves the right to refrain from or to terminate any commercial relationship if we have reason to believe that the supplier in question does not comply with our Supplier's Code of Conduct.

With the acceptance of this Supplier's Code of Conduct, current and future suppliers give their consent to follow the guidelines for sustainable business conduct that Boni Holding has defined in it.

6. Supplier Obligations

We expect that our suppliers will identify the above-mentioned risks within their immediate operations and own supply chains and take appropriate measures to address and resolve them. Therefore, in the case of a violation or suspicion of such occurrence, we urge our suppliers to inform the misconducting party about the occurring violations and discuss measures for their remediation or termination.

7. Anti-corruption and Due diligence

Boni Holding maintains a zero-tolerance policy toward all forms of corruption, bribery, and unethical business practices. Suppliers are expected to conduct their operations with integrity and transparency, and to comply with all applicable anti-corruption laws and regulations. This includes refraining from offering, promising, giving, or accepting any form of bribe or improper advantage, whether directly or indirectly. Suppliers must implement appropriate due diligence procedures to identify and mitigate corruption risks within their own operations and supply chains. Boni Holding reserves the right to assess and monitor

suppliers' compliance with these standards and may take corrective action, including termination of the business relationship, in cases of non-compliance.

8. Termination Rights

If our company suspects or comes across information of a potential breach of the rules of this Supplier's Code of Conduct, we will notify the supplier in question about those occurrences and provide a six-month notice period, to investigate and address the situation.

In the case no actions to address and resolve the occurrence of misconduct are taken, in the appropriate time frame, or the ones taken are insufficient and inadequate this would constitute a breach of our contractual relationship with the supplier in question.

9. Supplier Consent

With the signing of this document, the supplier commits to act responsibly and follow the guidelines acknowledged in this Supplier's Code of Conduct. The supplier takes responsibility to communicate the requirements of this Supplier's Code of Conduct within their immediate operations and within their own supply chain.

Version number	Approver	Periodic review date	Performed by	Next review date
1.0	Board of directors decision dated 05.06.2025			01.07.2026
2.0	Board of directors decision dated 05.06.2026			01.07.2028

