



COMMUNICATION ON PROGRESS 2021



UNITED NATIONS GLOBAL COMPACT

Growing value.





COMMUNICATION ON PROGRESS

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1. STATEMENT FROM THE CEO

Dear Reader,

Over the course of nearly two years, the global community has experienced and adapted to the healthcare challenges and commercial risks posed by the COVID-19 pandemic. Rural, less developed regions where Amatheon operates were hit hard and supply chains were and continue to be adversely affected by interruptions and destabilization arising against a backdrop of lockdowns, transport restrictions and other government-mandated measures. Progress has been made in the way governments aid rural communities to manage the effects of the pandemic. Amatheon recognises that management of the COVID-19 phenomenon will not only entail a consistent response at its locations in Europe but also dedicated engagement on the company's farms and in its interaction with local communities in Africa.

For Amatheon, as for global businesses worldwide, 2021 was a period that has had a profound effect on local and international value chains and fostered the need to adapt to new ways of working and operating cross-border businesses. As an international company with its headquarters in Europe and farming operations in sub-Saharan Africa, Amatheon has witnessed first-hand the changes COVID-19 brought to global actors and local communities.

Adjusting to this environment in 2021, Amatheon continued to diversify its portfolio through adding various hot chilli varieties to its range of high-value crops. The company successfully introduced this new crop to its existing Outgrower Programme, observing a welcomed expansion of the Programme this year. In the fourth quarter, Amatheon kicked off the next Outgrower season, which aims to fundamentally scale up outreach to small-scale farmers with a product range that now includes chillies, quinoa and chia. Moreover, given the rising global demand for organic products, Amatheon successfully doubled the number of certified organic farmers in 2021, and will continue with a greater emphasis on certified organic cultivation.

In October 2021, Amatheon inaugurated new processing facilities in Zambia, as the company celebrated its 10th anniversary in the country. The new facilities – a spice factory and a superfood factory – are located on the company's farm in Mumbwa District, and each is the first of its kind in the region. Spices and superfoods grown by Amatheon and in partnership with surrounding smallholder farmers through the Outgrower Programme will be cleaned, processed and packed for export on-site. This in-country value addition facilitates a direct link between the company and surrounding communities, leading to greater product diversity, higher local incomes and Outgrowers' improved access to international markets.

In Uganda, organic cultivation of crops continues, and focus has been put on the highly nutritious moringa tree. This year, the company will continue to expand the area of organic moringa and chia cultivation, which is very much in demand currently. With incremental, increasing use of organic farming techniques, the company aims to further reduce its environmental footprint.

Amatheon has now firmly established its place within the United Nations Global Compact. A signatory since 2015, the company has demonstrated its commitment to integrating the Global Compact's Ten Principles within management and day-to-day operations. Amatheon pledges to continue supporting these Ten Principles as well as illustrating how they are anchored within its business culture. We welcome the opportunity to demonstrate our most recent accomplishments in realising the UN's Sustainable Development Goals.

I hope you enjoy our latest Communication on Progress report.





2. AMATHEON AGRI AT A GLANCE

COMPANY PROFILE

Amatheon Agri is a European agribusiness and food company, headquartered in Berlin and operating in Sub-Saharan Africa. Focusing on farming, food processing and trading, Amatheon integrates its activities along the agricultural value chain and has improved local infrastructure, commercial and development activities through its presence in the countries where it operates: Zambia, Uganda and Zimbabwe.

Amatheon's strategy to produce grains for national and international food value chains gradually evolved into the production of "superfoods" as well as herbs and spices supplied to both local markets in Africa as well as to consumers in Europe. Amatheon's initiatives were significantly driven by the global demand for healthy food, expanding cultural awareness and the need for diversification of the product portfolio.

To safeguard top-notch quality standards suitable for international markets, Amatheon streamlined compliance mechanisms by way of implementing accredited management systems at farm level in Zambia and Uganda, as well as obtaining internationally recognized certifications at headquarters that apply to specific product requirements. As an upgrade to an already existing quality management system, Amatheon went even further by launching a new processing facility for spices and superfoods. The spices and superfoods grown by Amatheon Agri and in partnership with surrounding smallholder farmers in the Outgrower Programme are cleaned, processed and packed for export on-site. As an added bonus, the in-country value addition of the facility directly links the company to surrounding communities and increases job opportunities for local smallholder farmers.

SOCIAL IMPACT AND SUSTAINABILITY

Sustainable development and strong community relations have been essential to Amatheon Agri's business strategy and anchored within its company values since the company's inception. Amatheon's commercial farms in Zambia and Uganda are surrounded by traditionally cultivated lands. Here, agricultural production is limited to basic food needs which limits the possibility for farmers to earn a sustainable income from farming.

Amatheon acts as a primary investor through its large-scale farming operations and a trading partner with thousands of small-scale farmers, thus contributing towards alleviation of poverty in communities adjacent to the company's farms. Its business model results in significant growth for the surrounding communities through economic empowerment, social improvement and environmental enhancement. Bearing in mind that all activities can have an impact on surrounding communities, Amatheon is committed to acting in a socially responsible manner, emulating sound environmental management practices, upholding fair and ethical business conduct, respecting human, cultural and social rights as well as strictly adhering to international and domestic laws.

As an investor in a state-of-the-art processing facility for chillies, other spices and superfoods, Amatheon's aim is to improve contribution margins and also further scale the value chain and product portfolio. With a flake-milling technology installed at the company's Zambian subsidiary, Amatheon foresees a significant increase in added value with the company's own grown chillies as a strategic product which results in long-term sustainability through connecting rural communities with high-income markets.



OUTGROWER PROGRAMME

Since 2019, Amatheon's Outgrower Programme in Zambia has focused on providing small-scale farmers with the necessary knowledge to cultivate, handle and harvest high-value crops. Farmers are equipped with the necessary inputs, credit and a market for their harvest, including a pre-determined price for the crops to be paid by the company. Amatheon has shown small-scale farmers how to diversify their crops, secure an additional income for their household and put risk mitigation strategies in place, which makes them less dependent on subsistence maize farming. Following a contract-farming approach, Amatheon ensures the offtake of the harvested crops, one of the highlights of the Programme. At the same time, Amatheon uses its newly established certified processing and storage facilities to make high-quality products ready for export.

After introducing the export crops quinoa and chia to the Outgrower Programme, Amatheon expanded the project's crop portfolio and added a variety of hot-to-medium chillies in 2021. More than 1,000 farmers grew Bird's Eye and Long Slim Cayenne chillies this year and were able to generate an additional income.

Moreover, Amatheon's commitment to incrementally increase the volume of organically produced goods continued in 2021. The number of officially certified farmers and hectares doubled this year and demonstrates the acceptance and success of the organic system in the rural Mumbwa District.





ALL NATURAL AFRICAN GOODNESS

Amatheon was proud to announce a successful launch of its first consumer brand on the German market in 2020: ZUVA.

ZUVA brings nature's most amazing foods from the heart of Africa to plates and palates. ZUVA foods are healthy foods, naturally packed with nutrients, vitamins and minerals, which are fair and sustainably grown on fertile grounds under the African sun. ZUVA means 'sun' in a couple of African languages, such as Shona - and this is exactly what ZUVA products are: nourished by the African sun and naturally rich in key nutrients.

With ZUVA there are no refined sugars, no artificial ingredients, no palm oil and no flavour enhancers. Nothing but natural goodness. All products are 100% natural and sustainably grown in harmony with nature. To offer ZUVA, Amatheon builds respectful, long-lasting relationships with its local African partners. ZUVA foods benefit the people who enjoy them and the people who farm them.

In 2021, ZUVA launched six new convenient products – three Superfood Teff Porridges and three Quinoa Lunches – which are available in select German supermarkets, on Amazon.de and on the company's own web shop.

Find out more at:

www.amatheon-agri.com

www.zuva.de

www.facebook.com/zuvafoods

www.instagram.com/zuvafoods

3. ZUVA





Economic and social disruption caused by the COVID-19 pandemic has been particularly hard on many rural communities. Without the means to earn income during lockdowns, the rural population were unable to sufficiently feed themselves. Although the agricultural sector continues to function, the sector has been affected by lack of labour due to border closures, trade restrictions and confinement measures. Nevertheless, Amatheon Agri continued its commercial and social activities in line with the given restrictions in Zambia and Uganda in 2021.

The company continued to provide protective gear such as masks, hand sanitizers and hand washing basins to workers. Since Amatheon is dependent on seasonal workers especially during harvest season, the company rolled out a strict protocol in case staff or seasonal workers exhibited COVID-19 symptoms. In such cases, employees were referred to the closest district hospital for further tests. In addition, Amatheon was able to secure a stock of COVID-19 rapid tests on its farms. Confirmed cases were sent into strict isolation for 14 days. Moreover, movement to and from the farm was limited to only essential travel by providing farmers with the option of staying on the farm as opposed to commuting daily. In 2021, Uganda has still been subject to movement restrictions, whereby seasonal workers from neighboring districts require clearance from the resident district commissioner and police commander from both district of origin and host district to travel to another district for work. In order to keep its operations running, Amatheon provides accommodation for workers in Uganda. With help from the local Anaka Hospital which regularly notifies Amatheon when vaccines are available, 90% of Amatheon's Ugandan employees are now vaccinated.

On Amatheon's farms, the number of incoming visitors is limited and the company urges management to hold large meetings virtually if possible.

As the government of Uganda restricted social gatherings, engagements with local communities as well as activities of the Environmental and Community Sustainability Committee (ECSC) had to be suspended until 2022. Feedback from the ECSC has, however, continued through phone calls and meetings with committee officials.

Amatheon continues to assess governmental regulations in the countries where it operates and aims to continue supporting staff and partners.

4. IMPLICATIONS OF COVID-19 ON SUSTAINABILITY





Adopted in 2015 by the member states of the United Nations as a universal call to urgently solve the greatest environmental, social and economic challenges of the world by the year 2030, Amatheon Agri fully supports the implementation of the U.N. Sustainable Development Goals (SDGs). With its commercial farming activities, Outgrower Programme and various in-country community projects, Amatheon contributes to the following SDGs:



5. AMATHEON AGRI AND THE SUSTAINABLE DEVELOPMENT GOALS





6. IMPLEMENTING THE UNGC PRINCIPLES IN AMATHEON'S VALUE CHAIN

As a signatory of the United Nations Global Compact, Amatheon Agri commits to the four pillars of the UN Global Compact:

- Support the protection of human rights Pillar 1
- Guarantee international labour standards Pillar 2
- Improve environmental protection Pillar 3
- Fight corruption and bribery Pillar 4

The following tables show Amatheon's approach and the measures that are put in place in order to accomplish the UNGC standards.

PILLAR 1: HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Businesses should make sure that they are not complicit in human rights abuses

PRINCIPLE	IMPLEMENTATION
Recruitment and Cultural Diversity	<ul style="list-style-type: none"> • Amatheon Agri has a multicultural staff made up of Ugandans, Zambians, Zimbabweans, Kenyans, South Africans, Swazi, Germans, Americans, Russians, British, Irish and Australians. <ul style="list-style-type: none"> ◦ We do not tolerate any discrimination based on color, religion, sex, nationality, age, disability or sexual orientation. • We believe in and follow the best practices concerning working hours throughout the Amatheon Group. • We ensure that wages are in accordance with the laws and industry standards in the countries where we operate. • We never retain any workers' salaries, benefits or rights acquired or stipulated by law in order to force them to work or as a disciplinary action. • We determine present and future requirements of the organisation in line with its personnel planning and job analysis activities.
Zero Child Labour	<ul style="list-style-type: none"> • We respect and uphold internationally recognized human rights policies with respect to forced, compulsory or child labour. • We respect and uphold employment laws by not employing persons below the age of fifteen. • We received zero complaints on child labour in 2021. Any complaint would be taken seriously. • We scrutinise national identification cards as a prerequisite for recruitment and oblige contractors to do the same prior to engaging any worker. • We discourage farmers and any workers as part of our Outgrower Programme from making their children work.
Occupational Health and Safety Policy (OHS)	<ul style="list-style-type: none"> • We are committed to the safety of employees at our workplace and ensure all site workers go through a safety induction program before they start work. • We equip employees operating on site with personal protective equipment (PPE). • We conduct hazard and risk assessments associated with work at the farms for the safety of all our visitors and employees. • We make certain that safety material data sheets are always up to date and available for inspection. <p>➔ <i>Due to the COVID-19 pandemic Amatheon has adopted new safety measures for extra protection such as providing masks, hand sanitizers, hand washing basins and non-contact infrared thermometers, and facilitated the availability of vaccines for the company's Ugandan and Zambian employees.</i></p>
Respect of Human Rights	<ul style="list-style-type: none"> • We do not permit any type of forced labour, including working under the regime of imprisonment, in agreement with the International Labour Organization (ILO) Conventions 29 and 105 and national labour laws. • In Zambia and Uganda, our employment contracts are attested by the Ministry of Labour and Social Security (Zambia) and the Ministry of Gender, Labour and Social Development (Uganda).



Sexual Harassment Policy	<ul style="list-style-type: none"> We provide a safe environment for all our employees free from discrimination on any grounds and from harassment at work, including sexual harassment. During the onboarding of new employees we share the social relationship policy together with all other necessary policies. We received zero complaints on sexual harassment in 2021. Any report of such would be taken seriously. We engage in active dialogue with our employees through periodic meetings. We do not condone sexual harassment in any way. We ensure that trained personnel are available to support employees on a variety of topics, including sexual harassment.
Disciplinary Policy	<ul style="list-style-type: none"> We have a Disciplinary Code of Conduct which highlights the rules and regulations of the company and what consequences the employee will face if he/she does not abide by them. The goal of our disciplinary policy and procedure is the equal and fair treatment of all our employees.
Grievance Policy	<ul style="list-style-type: none"> We have a grievance procedure in place which stipulates how grievances are to be raised, e.g. during disputes between employees. Grievance procedure is handled through Amatheon's Human Resources Department. We provide grievance boxes at the various operating sites which are also available to surrounding community members. In Uganda, community grievances are channeled through the Area Local Councilors and the Environmental and Community Sustainability Committee. Employees have formed welfare committees (both for permanent staff and the seasonal workers) where they can report grievances. In Zambia, a management committee convenes and discusses grievances with the party/parties involved. All complaints will be taken seriously and dealt with without unreasonable delay.

Social Development and Sustainability	<ul style="list-style-type: none"> We successfully address communities' and Amatheon's concerns around operations, align community engagement strategies accordingly and jointly plan social development projects. We have a vigorous Environmental and Community Sustainability Committee (ECSC) as a multi-stakeholder platform in Amatheon's immediate area of operations. The ECSC committee members meet regularly (every 3 months) to discuss with communities, authorities and Amatheon staff in Uganda and Zambia. We have a partnership with the Anaka Hospital in Uganda through which a team of nurses, doctors and laboratory technicians diagnose and treat basic illnesses in the community during regular health outreach days. Health care services are delivered to villages in hard-to-reach areas. We partnered with the German Arbeiter-Samariter-Bund (ASB) and other German organisations through a health care partnership in Zambia to improve health care services, facilities and delivery in Mumbwa District. Through this partnership, an ambulance has been donated to the Mumbwa District Health Office (DHO) as well as bicycles to support rural health volunteers. In the season 2020/2021, we trained 2,000+ farmers in the organic and conventional cultivation of a new crop, quinoa, and established a trading partnership with them in Zambia. Since inception of the Outgrower Programme, we have trained 8,000+ farmers in topics like conservation agriculture, farming as a business, crop health and post-harvest management and livestock handling. In the season 2020/2021, together with ECOCERT we organically certified 200+ farmers and steadily encourage more farmers to adopt organic farming practices. We are discussing partnerships with international stakeholders to further expand our Outgrower Programme We are discussing a possible public-private partnership (PPP) with Nwoya District local government in Uganda to extend clean water to local community through construction of boreholes. <p>➔ Due to the COVID-19 pandemic and local restrictions put in place in the countries where Amatheon operates, the engagements, e.g. with the ECSC are currently on hold until 2022. However, meetings with the selected representatives (chairperson and secretary of the committee) continued, including phone call interactions. The partnership with Anaka Hospital is suspended for the same reason.</p>
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PILLAR 2: LABOUR STANDARDS

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour.

Principle 5: Businesses should uphold the effective abolition of child labour.

Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

PRINCIPLE	IMPLEMENTATION
Promoting Equality and Diversity	<ul style="list-style-type: none"> We have pledged to continue increasing the number of women at all levels of the company and encourage equal opportunities for disabled. We champion diversity at Amatheon by having a multicultural team in place and ensuring that decisions are made based on merit and not influenced by bias. We have adopted equality and diversity policies such as policies on language use and individualized leave schedules.
Occupational Health and Safety Policy (OHS)	<ul style="list-style-type: none"> We arrange for all employees to undergo proper induction and train them in risk assessments to minimise risks of workplace accidents. We carry out routine training sessions to raise employees' awareness and sensitize them on topics such as first aid, accidents, chemical handling, fire response, protective clothing, HIV/AIDS, sexual harassment and personal security. We have planned a safety management mechanism which encompasses working behaviours and safe work practices that are expected from all Amatheon employees. We counsel people on alcohol abuse, domestic violence and HIV in Zambia. We provide accident and medical insurance for temporary and permanent employees. We have a vigorous accident reporting scheme in place.

Zero Child Labour	<ul style="list-style-type: none"> We respect and uphold local and internationally recognized human rights with respect to forced, compulsory or child labour. We received no complaints on child labour in 2021. Any complaint received would be taken seriously. We scrutinise national identification cards as a prerequisite for recruitment and oblige contractors to do the same. We discourage farmers and any worker part of our Outgrower Programme from making their children work.
Employee Representatives	<ul style="list-style-type: none"> We support the establishment and functioning of local organisations and trade unions. We have representatives of the National Union of Plantation, Agriculture and Allied Workers (NUPAAW) present in Zambia. In Zimbabwe we follow and comply with Category D (iv, v and viii) of the Code of Conduct and Grievance Procedure for the Agricultural Industry (Statutory Instrument 116 of 2014).
Social Security	<ul style="list-style-type: none"> We provide social security benefits to employees through national pension schemes, workers' compensation funds, housing and payment of utilities and medical treatment for workers and their families in Zambia and Uganda.
Wages	<ul style="list-style-type: none"> We pay above minimum wage, which was verified in Zambia by the Zambian Ministry of Labour and Social Services in 2016.
Employee Accommodations	<ul style="list-style-type: none"> We provide housing facilities and technical equipment for permanent staff and their families in Zambia and Uganda. Casual workers are also accommodated. Meals are provided for employees and workers who cannot go home for lunch (e.g. due to distance). Transport to and from work is provided to all commuting employees.





PILLAR 3: ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

PROMOTING ORGANIC FARMING TECHNIQUES

Awareness among consumers about the health benefits from organically cultivated products as well as the positive impact such cultivation has on the environment have led to a steady increase in global demand for organic products. As part of Amatheon's commercial business strategy, the company commits to implementing organic farming techniques, reducing the environmental footprint of its operations and integrating renewable energy resources into its operations and value chain. In Zambia and Uganda, large parts of Amatheon's operational lands are successfully certified organic by internationally recognised certification bodies or are currently in the process to become certified.

Moreover, smallholder farmers who are part of the company's Outgrower Programme are encouraged to apply environmentally friendly cultivation techniques. This is made possible by providing free training on topics of organic farming, including crop rotation, green manures and compost and biological pest control which is delivered to farmers and communities around Amatheon's farm. In 2021, around 200 farmers were organically certified by ECOCERT, and Amatheon is striving to increase this number.

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA)

A comprehensive evaluation of a project's environmental and social impact is prepared for greenfield developments or large project expansions that are likely to have such effects. The process of identification and description of the environmental and social baseline is crucial for identifying potential impacts and defining management measures as well as providing a complete overview of weaknesses and strengths of the project from environmental, economic or social perspectives. ESIA's are conducted in line with respective policies, legislation and other institutional frameworks as applicable.

INTERNAL ENVIRONMENTAL MANAGEMENT PLANS (EMPS)

Environmental Management Plans stem from the ESIA. The EMP guides Amatheon on the implementation of a holistic management system and looks at land and soil, air quality, noise, water management, biodiversity, traffic, health and safety as well as cultural heritage sites. Based on this plan, Amatheon carries out frequent monitoring to continuously improve its environmental performance and reduce its environmental footprint. Sustainable development and strong community relations have been essential to Amatheon Agri's business strategy and anchored within its company values since the company's inception. Amatheon's commercial farms in Zambia and Uganda are surrounded by traditionally cultivated lands. Here, the agricultural production is limited to basic food needs which limits the possibility for farmers to earn a sustainable income from farming.

PRINCIPLE	IMPLEMENTATION
Environmental Policy	<ul style="list-style-type: none"> In Uganda and Zambia, we have an environmental policy in place which sets the foundation and operational procedures for the protection of soil, ground and surface water, air quality and the ecosystem in general. We implement continuous operational improvement techniques, e.g. regular surveying of our farm to monitor efficiency of our energy and water use. We train and encourage farmers to apply organic farming techniques to improve soil fertility and water quality. In the season 2020/2021, around 200 farmers were successful organically certified. In liaison with the local community we discourage environmentally depleting behaviours like deforestation and poaching and train farmers in conservation farming methods through partnerships with the Conservation Farming Unit, DEG, USAID, Musika and World Vision.
Environmental Management Plan	<ul style="list-style-type: none"> We routinely assess environmental hazards and risks posed by our operations through environmental audits, and appropriate measures are introduced to reduce any identified risks. We have in place functional environmental management plans and environmental policies, and we conduct onboarding sensitisation for all our new employees. In addition to our existing ESIA's, we conduct new ESIA's of all new facilities once they start operating.
Zero Environmental Incidents	<ul style="list-style-type: none"> We have formed an Environmental and Community Sustainability Committee that supports environmental monitoring. The committee advises on matters impacting the environment and acts as a forum to communicate any community concerns or incidents. The impact on communities and the environment is considered before any investment is made. We are constantly studying how to reduce the company's environmental footprint and improve performance. We protect water sources with warning posts, pillars and signs.
Sustainable Soil Management	<ul style="list-style-type: none"> We minimise soil compaction through the use of low or no tillage and ploughing back crop residues to provide stable physical context for movement of water, air and heat as well as root growth. We protect soil by providing sufficient surface cover for growing cover crops and maintaining crop residues. We rely on optimised and safe use of agro-inputs. We conduct regular soil testing to ensure that nutrients are not completely depleted from the soil. We practice organic farming by practicing crop rotation, growing cover crops, use of organic fertilizers and minimum tillage. These practices encourage soil flora and fauna, improve soil structure and create a more stable system. Such management practices also play a key role in erosion control. We train smallholder farmers in techniques on how to recuperate degraded soils and to improve ecosystem services. We train smallholders in the cultivation of organically grown crops. We partner with Conservation Farming Unit, World Vision, DEG, USAID, Musika and World Vision in Zambia to deliver high quality training at no cost.



Water Management	<ul style="list-style-type: none"> We protect water sources by monitoring water quality regularly. Testing of water quality is done by a certified and accredited laboratory in Uganda. We protect water sources downstream by maintaining a buffer zone (30 meters) from the river to minimize export of soil particles and associated nutrients and contaminants into the water source. As a member of Upper Nile Water Catchment Management Committee (Uganda), we attend workshops and exchange visits to learn good water management practices. We participate in training workshops for sustainable water management. We build drainage systems which prevent run off of water from the fields and contamination of streams.
Waste Management	<ul style="list-style-type: none"> We partner with a registered and certified company to pick up and dispose of hazardous waste in an environmentally acceptable manner. We have good waste management practices through the use of three Rs (reuse, reduce and recycle). These cut down on the amount of waste. We have introduced innovative technology which uses rice straw material in the production process to manufacture zero carbon panels, ceiling boards, etc. which are cheaper and to replace the use of cement and sand. This innovation is environmentally friendly and reduces the amount of waste during land preparation.
Sustainable Investment Practices	<ul style="list-style-type: none"> We partner with certified companies to pick up and recycle used oil. Where possible, we use sustainable energy sources, such as solar power, and will incrementally increase this energy source.

PILLAR 4: ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

PRINCIPLE	IMPLEMENTATION
Code of Conduct Anti-Bribery and Anti-Corruption Policy	<ul style="list-style-type: none"> Our Code of Conduct prohibits all forms of corruption. All Amatheon business and financial records must be transparent, fair and accurately reflect the development of the company and its assets. Secret, unrecorded or unreported transactions are prohibited. We encourage staff to take e-learning classes and share specific examples in our policy to establish a clear understanding of the subject. Distributors, suppliers, agents, consultants and other third parties working for/with us who are found to be acting in violation of our policy will be subject to termination of the business relationship as well as any other legal and remedial actions available under applicable law. Any employee found in violation of this policy will be subject to disciplinary action.
Application of Local Codes of Conduct	<ul style="list-style-type: none"> We generate a monthly case register at HR which reports on work against corruption.
Induction Requirements	<ul style="list-style-type: none"> We ensure our anti-corruption policy is acknowledged during the on-boarding phase for all new employees.
Anti-Corruption Component	<ul style="list-style-type: none"> We ensure there is an anti-corruption component or equivalent in major agreements we sign with partners and contractors.





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