



CODE OF BUSINESS CONDUCT

CRIS-TIM FAMILY HOLDING S.A.

approved in the Board of Directors meeting of 11.05.2026

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I. INTRODUCTION

This Code of Conduct establishes the principles and norms of professional ethics and constitutes the common basis that all employees of CRIS-TIM FAMILY HOLDING S.A. (hereinafter also referred to as the “**Company**”) must share. The code is designed to help employees understand what their responsibilities are in order to raise business standards to the highest possible level.

By adopting this code, CRIS-TIM FAMILY HOLDING S.A. reaffirms its commitment to customers, suppliers, public authorities, other business partners and employees, in order to maintain their trust, in all circumstances, ensuring for their benefit a relationship in accordance with business ethics, in compliance with the principles of honesty, integrity and fair practice.

This Code of Conduct sets out the fundamental principles and values that guide the activity of the Company, the members of the Company’s Board of Directors (the “**Board**”), the executive management and all employees, and applies to all employees of the Company, regardless of where they work, regardless of their position and position in the hierarchy, all activities carried out by the Company, as well as third parties acting on behalf of the Company (consultants, agents, external service providers, etc.).

CRIS-TIM FAMILY HOLDING S.A. and its suppliers of goods and services mutually undertake to make every effort to comply with the provisions of this Code of Business Conduct and to provide the necessary support for its implementation.

II. PRINCIPLES

A. **Compliance with legislation and regulations**

Compliance with the legislation is the most important principle underlying the policies of CRIS-TIM FAMILY HOLDING S.A. All employees must comply with and comply with the regulations in force.

All members of the Board, the executive management and employees of the Company must act with integrity, honesty and professionalism in all activities carried out, fully complying with the form and spirit of the law and internal regulations.

Also, all employees have the obligation to perform their duties with integrity and to comply with the highest professional standards in the relationship with customers, suppliers, public authorities and other business partners.



B. Respect for the individual

1. Equal opportunities for all employees

CRIS-TIM FAMILY HOLDING S.A. is an employer that offers equal employment opportunities, regardless of race, nationality, ethnicity, language, religion, social category, beliefs, gender, sexual orientation, age, disability, chronic non-contagious disease, HIV infection, belonging to a disadvantaged category or any other criterion protected by law.

This principle applies in all aspects of employment relations, including the announcement and organization of competitions and the selection of candidates for vacant positions, the conclusion, amendment, suspension and/or termination of employment relationships, the establishment or changes to the duties in the Job Description, the determination of salary, the granting of benefits other than those of a salary nature, professional counseling, the evaluation of individual performances, professional promotion and the application of sanctions disciplinary.

2. Diversity and prevention of acts of discrimination and harassment

CRIS-TIM FAMILY HOLDING S.A. is committed to providing a safe working environment and respects the principles of equity, equality, diversity and inclusion. CRIS-TIM FAMILY HOLDING S.A. considers equal opportunities and treatment without any discrimination a priority and applies a zero tolerance policy towards any act or deed of harassment or discrimination.

All employees, but also those in business relations with CRIS-TIM FAMILY HOLDING S.A. must comply with this policy.

3. Prohibition of forced labor and slavery

CRIS-TIM FAMILY HOLDING S.A. prohibits the use of involuntary or forced labor, including all forms of child labor, human trafficking and slavery. CRIS-TIM FAMILY HOLDING S.A. is strongly committed to preventing these practices in the supply chain and expects suppliers to do the same.

4. Occupational health and safety

CRIS-TIM FAMILY HOLDING S.A. ensures a safe and healthy working environment in all its work points.

Employees will be provided with workspaces equipped with all the equipment and utilities necessary for their use in complete safety conditions and a set of minimum procedures will be



established regarding the maintenance of these spaces and equipment in optimal use, including by cleaning them.

All necessary measures will be taken to prevent, track and report occupational accidents and diseases at work.

Employees will benefit from access to healthcare and other appropriate medical services.

Employees' access to clean toilets and drinking water, as well as hygienic-sanitary materials, will be ensured.

All appropriate fire protection and emergency measures will be taken.

Employees will benefit from work equipment and protective equipment.

Each employee must contribute to collective safety by behaving responsibly and in accordance with the applicable safety, hygiene and health rules and procedures, as well as reporting any potentially dangerous or potentially risky situation.

5. Protection of personal data

CRIS-TIM FAMILY HOLDING S.A. ensures the confidentiality of personal data and undertakes to comply with the provisions of the normative acts with regard to personal data, including but not limited to the provisions of Regulation no. 2016/679 on the protection of natural persons and with regard to personal data. the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR), establishing the necessary measures and the responsibility of employees for the fulfilment of the obligations relating to the guarantee of and the protection of the fundamental rights and freedoms of natural persons, and in particular the right to intimate, family and private life, according to the applicable "Personal Data Protection Policy".

C. Respect for the environment and consumer health

As part of its commitment to sustainable development, CRIS-TIM FAMILY HOLDING S.A. has integrated environmental aspects into its strategy and culture and promotes sustainability in the food industry by:

- a) permanent investments in new equipment and technologies;
- b) the use of high-quality ingredients;
- c) implementation of quality control and food safety systems;
- d) the use of ecological and biodegradable packaging;
- e) use of electricity from renewable sources.



The production of high-quality and sustainable food plays an important role in both protecting the environment and the health of the consumer.

D. Asset protection

1. Protecting information

Employees are obliged to keep confidential the data and information they have become aware of or accessed during the execution of the employment contract and to use the mentioned data, documents and information only for the performance of their work tasks.

The keeping of confidential information is paramount in the smooth running of CRIS-TIM FAMILY HOLDING S.A.'s activity, therefore prudence and discretion are necessary in the use of such information and in disclosing it only in front of those persons entitled to know it.

Employees will not, under any circumstances, disclose information that is not public. Employees will not disclose the information to which they have access in the performance of their current duties and are not allowed to use it in any way for personal interest or for the benefit of third parties.

2. Protecting heritage

The employees are obliged to rationally use and take care of the patrimony of CRIS-TIM FAMILY HOLDING S.A., including the goods handed over by it in order to facilitate the fulfillment of the service tasks.

E. Financial reporting

All transactions of CRIS-TIM FAMILY HOLDING S.A. must be properly recorded in order to allow the preparation of clear financial reports, in accordance with the applicable accounting principles. Any recording of accounting documents or documents containing false information, as well as the omission of accounting for a payment, committed for the purpose of concealing acts of corruption, is prohibited. No employee will be involved in such operations.

F. Fair competition

CRIS-TIM FAMILY HOLDING S.A. prohibits anti-competitive practices that have as object or may have the effect of restricting, preventing or distorting competition, as well as acts of unfair competition. In this regard, employees cannot agree with competitors on:

- a) to establish, directly or indirectly, purchase or sale prices or any other trading conditions;
- b) limitation or control of production, marketing, technical development or investment;



- c) the sharing of markets or sources of supply;
- d) the application, in relations with trading partners, of unequal conditions for equivalent services, thus creating a competitive disadvantage for them;
- e) conditioning the conclusion of contracts on the acceptance by the partners of additional services which, by nature or in accordance with commercial usage, are not related to the object of these contracts.

In its activity, CRIS-TIM FAMILY HOLDING S.A. is involved in a large-scale competitive process. Oral or written discussions and agreements with competitors regarding pricing or other competitive policies are not permitted. In commercial meetings specific to the field of activity, competition policies cannot be discussed. In this regard, employees must analyze together with the legal representative the rules of the group, association or organization that addressed the invitation to the employee.

CRIS-TIM FAMILY HOLDING S.A. does not tolerate activities that try to obtain unfair competitive advantages. No employee may engage in any activity that violates any restrictive agreement signed by such employee for the benefit of a third party, and no employee may disclose, directly or indirectly, any confidential information or trade secrets of a third party that such employee obtained during the time he was employed or associated with such third party.

G. Rejection of corruption

CRIS-TIM FAMILY HOLDING S.A. demonstrates zero tolerance towards corruption, regardless of whether it is public or private, direct or indirect.

In this regard, Employees are strictly prohibited from offering things of value, directly or indirectly, to government officials and business partners in order for them to offer or promise an undue advantage.

CRIS-TIM FAMILY HOLDING S.A. prohibits all its employees from demanding, accepting or receiving goods, services, privileges or advantages in any form from any persons who are in business relations with the Company (customers, suppliers, contractors, etc.).

The Company prohibits any form of fraud, corruption or bribe. Any attempt at fraud or bribery will be sanctioned in accordance with internal policies and applicable legislation. No derogation from these requirements shall be accepted for any member of the Board, executive management or employee.



H. Government Contracts and Services

CRIS-TIM FAMILY HOLDING S.A. undertakes to comply with all applicable laws and regulations relating to government contracts and services (public procurement) and to ensure that its reports, certificates and declarations to government officials are complete and accurate.

I. Prevention of conflicts of interest. Loyalty and fidelity

Employees are obliged to devote all their time (according to the provisions of the individual employment contract regarding the duration of work) to the service and in the interest of CRIS-TIM FAMILY HOLDING S.A. to abstain from any act or fact that could harm its interests.

Employees are prohibited from soliciting or accepting gifts, money, services, favors, invitations or any other advantages or benefits, which are intended for them personally, family, parents, friends or persons with whom they have had business or other relations in order to perform their duties, activities and current responsibilities or to ignore/violate them.

Employees do not have the right to request, accept or receive/keep directly any benefit from customers or suppliers of CRIS-TIM FAMILY HOLDING S.A., natural or legal persons, with whom they have or have had working relationships. In this context, personal benefit is understood as any type of gift, gratuity, favor, service, loan, commission or anything else with material value. Exceptions to this rule are:

- symbolic gifts received during the holidays, with an estimated value of up to 1,000 Ron;
- unsolicited promotional or promotional materials (e.g. agendas, pens, epci, tablets, calendars, etc.);
- gifts received on the occasion of marriage or other social events that are not related to the work environment.

During the execution of the Contract, the Employees are prohibited, without the prior written consent of CRIS-TIM FAMILY HOLDING S.A., to exercise, directly or indirectly, free of charge or for consideration, any activity in competition with that carried out by CRIS-TIM FAMILY HOLDING S.A.

In particular, the Employees are obliged not to perform, directly or indirectly, without the prior consent of CRIS-TIM FAMILY HOLDING S.A., activities identical or similar to those performed for the Company, and under the individual employment contract, according to the Job Title, and for personal interest or for third parties (such as an employee, collaborator, associate, representative, etc.), for a person who works in a field identical or similar to that of the Company.



III. CODE MANAGEMENT

A. Compliance with the Code of Conduct

The Code of Conduct applies to all members of the Board, executive management and employees of the Companies.

All employees have a personal responsibility to understand and comply with this Code of Conduct. In this regard, each employee will sign a declaration of commitment (integrity) for this purpose. The declarations of integrity will be kept in the personal file of each employee.

Employees with managerial positions must ensure that subordinate employees understand and comply with the standards and requirements stipulated in this Code.

Any problem of interpretation, as well as any suggestion for improvement, will be transmitted to the Compliance Officer.

The employee who violates any provision of this Code will be subject to disciplinary action. In cases suspected of corruption or other crimes, the competent authorities will be notified.

B. Sanctions

Compliance with the Code is mandatory, and failure to comply with it may result in disciplinary action, including termination of employment or collaboration.

Any employee who has been found guilty of violating the provisions of this Code may be disciplined in accordance with the provisions of the Labor Code and the Internal Regulations, with:

- written warning;
- demotion from office, with the granting of the salary corresponding to the position to which the demotion was ordered, for a duration that cannot exceed 60 days;
- reduction of the basic salary for a period of 1 – 3 months by 5 – 10%;
- reduction of the basic salary and/or, as the case may be, of the management allowance for a period of 1 – 3 months by 5 – 10%;
- disciplinary termination of the individual employment contract.



C. Reporting

CRIS-TIM FAMILY HOLDING S.A. encourages employees to provide information that could help in the process of investigating and correcting legal and ethical violations that may occur.

If employees are aware of a possible violation of the provisions of this Code or of any legal or regulatory requirement, they must notify the Compliance Officer by any means of communication.

Also, employees (whistleblowers) can report any violations of the law that have occurred or are likely to occur at the level of CRIS-TIM FAMILY HOLDING S.A. through the Whistleblowing Policy adopted and applied at the Company level, available at https://cristim2prodcom.sharepoint.com/Documente%20partajate/16.%20Politica%20Whistleblowing_avertizor%20integritate.pdf and by using the link available online <https://cristim.whistlelink.com/> for reporting.

All reports will be confidential and will only be disclosed to people who need to know them.

No employee shall be disciplined and shall not be subject to any coercive measures in any way for reporting in good faith the violations of the provisions of this Code. Coercion against any employee for reporting violations or for giving testimony, providing assistance or participating in checks is strictly prohibited. Any employee who believes that he has been subjected to or witnessed coercion must report immediately to the Compliance Officer.

D. Compliance Officer

Within CRIS-TIM FAMILY HOLDING S.A., a Compliance Officer is appointed with, among others, the following attributions:

- a) providing advice and assistance to employees regarding compliance with the rules of conduct;
- b) monitoring the application of the provisions of the Code of Conduct;
- c) investigating violations of the provisions of the Code and submitting proposals for sanctions to the General Manager;
- d) the elaboration of various procedures in the application of the Code;



- e) elaborating analyses on the causes, risks and vulnerabilities that manifest themselves in the employees' activity and that could determine a violation of the principles and rules of conduct;
- f) proposing measures to remove the causes, reduce risks and vulnerabilities;
- g) organizing information sessions for employees on ethics norms, amendments to the legislative framework in the field of ethics and integrity;
- h) periodic reporting to the Audit Committee on the implementation and effectiveness of the Code, as well as recommending updates or amendments to be made to it;
- i) reporting at least every 3 months to the Audit Committee on notifications of violations received, issues investigated and/or measures taken, as appropriate

This document has been drafted in English and Romanian. In case of discrepancies between the two versions, the Romanian version shall prevail.