



POLICY GUIDE

Global Code of Conduct

NUMBER: COMP-01GPT | EFFECTIVE DATE: 01/01/2026

TABLE OF CONTENTS:

Section 1: Purpose and Scope

- 1.1 Purpose of the Code of Conduct
- 1.2 Applicability to Employees, Contractors, and Partners
- 1.3 Integrity and Ethical Commitments
- 1.4 Alignment with Company Values

Section 2: Relationship of the Code to Laws, Regulations and GPT Policies

- 2.1 Role of Leadership and Management
- 2.2 Compliance with Laws and Regulations
- 2.3 Reporting Violations and Non-Retaliation
- 2.4 Governance and Compliance Framework

Section 3: Workspace Conduct

- 3.1 Health, Safety, and Security Standards
- 3.2 Discrimination, Harassment, or Disrespect

Section 4: Business Integrity

- 4.1 Conflicts of Interest
- 4.2 Accurate Financial and Operational Records
- 4.3 Use and Protection of Company Assets
- 4.4 Protection of GPT's Intellectual Property
- 4.5 Responsible Use of Artificial Intelligence
- 4.6 Data Privacy and Cybersecurity
- 4.7 Communication and Social Media Guidelines



- 4.8 Anti-Money Laundering
- 4.9 Anti-Bribery and Anti-Corruption

Section 5: Customer and Market Relations

- 5.1 Product Quality
- 5.2 Fair Competition and Antitrust Compliance
- 5.3 Government Contracting Standards
- 5.4 International Trade and Export Controls

Section 6: Supplier and Third-Party Engagement

- 6.1 Ethical Supplier Relationships
- 6.2 Gifts, Entertainment, and Hospitality
- 6.3 Human Rights and Labor Practices
- 6.4 Philanthropy
- 6.5 Environmental Sustainability
- 6.6 Conflict Minerals

Section 7: Political and Civic Engagement

- 7.1 Guidelines for Political Activities

Section 8: Policy Administration

- 8.1 Reference to Supporting Policies and Procedures
- 8.2 Resources for Guidance and Support
- 8.3 Policy Review and Updates
- 8.4 Continuation and Modification



1. PURPOSE AND SCOPE

1.1 Purpose of the Code of Conduct

Grain & Protein Technologies (“GPT”) is a leading global designer, manufacturer, and marketer of reliable, durable, and innovative equipment solutions for grain, seed, poultry, egg, and swine production. The Company goes to market with its strong portfolio of industry-leading brands: GSI, Cumberland, AP, Tecno, Cimbria, Aerotech, Reventa, and Euroemme. With its Company Purpose of “Feeding the World Better”, GPT emphasizes advancing smart technologies and offering innovative technical solutions to make farmers and agribusiness managers more productive and profitable in a sustainable way. We are committed to delivering high-performance solutions that maximize machine utilization while minimizing energy consumption and environmental impact.

In view of this, this Code of Conduct (hereinafter, the “**Code**”) provides shared ethical standards that ensure all who act on behalf of GPT act with integrity, transparency, and accountability in all circumstances. By following these principles, GPT aims to prevent behaviors that could harm its business partners, reputation, stakeholders, or the communities in which it operates.

In addition to this Code, GPT has implemented a set of corporate guidelines, internal procedures, and operational processes that complement and integrate the principles of the Code. The Code should be interpreted and applied in conjunction with GPT’s policies, ensuring consistency and alignment across all levels of the organization. These policies form an essential part of GPT’s governance framework and are accessible to employees on the GPT HUB or upon request.

1.2 Applicability to Employees, Contractors, and Partners

The Code applies to all officers, directors and employees of GPT companies. Compliance with the Code is integral to the manner in which GPT conducts business and to the relationship between GPT and its employees.

Failure to comply with any of the provisions set forth in this Code of Conduct may result in disciplinary action, including, but not limited to termination, in accordance with applicable law.

GPT may provide consultants, agents, sales representatives, distributors, vendors, contractors, or subcontractors with a copy of this Code and require or encourage them to comply with relevant aspects of it. If any such third party fails to comply with the principles set forth in this Code, GPT may take any appropriate action, including, but not limited to, termination of the relationship.



This Code alone is not intended to create, nor does it create, any contractual rights or obligations, express or implied, and does not alter the at-will or other applicable employment relationship, to the extent permitted by law.

1.3 Integrity and Ethical Commitments

We succeed as individuals and as a company when we take the time to learn from one another, listen to different points of view, and treat each other with mutual respect. Everyone is responsible for helping to prevent the occurrence of discrimination, harassment, intimidation, and other abusive conduct in the workplace. This includes promptly reporting observed instances of inappropriate behavior to a supervisor, Human Resources, or Legal & Compliance, without fear of retaliation. Individuals are expected to act with integrity and be mindful of the impact of their behaviors and words on others.

1.4 Alignment with Our Winning Values

GPT's foundational values of integrity, transparency, constant learning, and passion for customer success requires all activities to be conducted with the highest standard of ethical conduct. Every individual is required to demonstrate ethical and professional behavior in fulfilling their responsibilities and in all interactions with colleagues, customers, and partners.

2. RELATIONSHIP OF THE CODE TO LAWS, REGULATIONS AND GPT POLICIES

2.1 Role of Leadership and Management

Leadership plays a crucial role in shaping and upholding a Code by setting the ethical tone for the entire organization. Leaders are responsible for modeling the values and behaviors outlined in the Code, ensuring that expectations are clearly communicated and consistently enforced. They foster a culture of integrity by promoting transparency, accountability, and open dialogue, encouraging employees to speak up without fear of retaliation. Through regular training, monitoring, and policy updates, leadership ensures that the Code remains relevant and effective. Ultimately, their commitment to ethical standards strengthens trust, drives responsible decision-making, and reinforces the organization's reputation.

2.2 Compliance with Laws and Regulations

GPT recognizes, complies with, and respects the laws, rules and regulations in all the countries where it operates as a fundamental principle. All directors, officers, employees, and third parties with whom GPT conducts business are required to diligently acquire knowledge of the laws and



regulations applicable to their work, comply with all applicable legal frameworks, and refrain from any actions that could violate the law.

This Code defines the principles that govern GPT's business conduct across all locations. In cases where local customs, laws, or regulations differ from the provisions of this Code, the standard representing the highest level of ethical behavior shall be applied. There may be instances where the laws of two or more countries are in conflict. In such cases, please consult GPT's Legal & Compliance Department to determine the appropriate course of action.

2.3 Reporting Violations and Non-Retaliation

Although this Code and GPT's policies serve as a guide, they are not a substitute for sound decision-making. If the Code does not address a particular issue or question, individuals are expected to exercise good judgment and common sense in determining an appropriate course of action. It is essential to pause and reflect in these moments before proceeding.

Situations that appear inappropriate, raise regulatory or ethical concerns, violate company policy, or pose any other risk to GPT, its employees, or business partners should be reported immediately. Remaining silent may allow problems to escalate. Honest, accurate, and timely reporting helps safeguard GPT, the workplace, colleagues, and the broader community. Adherence to this Code is a collective responsibility, and its values are reinforced through the actions of all organizational members.

GPT is committed to supporting individuals who raise or assist in resolving concerns. Additionally, employees are expected to promptly report known or suspected violations of this Code, applicable law, or GPT policies, and failure or omission to do so may itself be considered a violation of this Code. All employees are expected to cooperate fully, honestly, and in good faith with internal investigations, audits, or inquiries conducted by or on behalf of GPT. Failure to cooperate may itself also constitute a violation of this Code. To protect the integrity of investigations, GPT may request that information relating to an investigation be treated confidentially, consistent with applicable law and employees' legal rights.

GPT strictly prohibits retaliation against anyone who, in good faith, reports or provides information regarding a suspected violation of any law, this Code, or GPT policies. Any act of retaliation will be subject to disciplinary action, up to and including, but not limited to, termination of employment. Additional resources can be found in Section 8.2.

2.4 Governance and Compliance Framework



GPT conducts its activities with the professionalism demanded by its responsibilities, striving to achieve corporate objectives while acting diligently and in good faith, in strict accordance with applicable laws and regulations across all locations where it and its affiliates operate.

3. WORKSPACE CONDUCT

3.1 Health, Safety, and Security Standards

The health and safety of every employee, and visitors to a GPT facility, is the highest priority of the company. Employees must perform their duties fully capable, and as such, the use, possession, distribution, or being under the influence of illegal drugs or alcohol in the workplace is prohibited. Employees are required to disclose the use of any prescribed or over-the-counter medication that could impair judgment, alertness, or the ability to perform work safely. Employees must not perform safety-sensitive duties while impaired. Failure to comply may result in disciplinary action, up to and including termination of employment, to the extent permitted by applicable law. Disclosures of medication use will be handled confidentially and in accordance with applicable privacy and disability-related laws.

Workplace violence, including threats or acts of violence, of any kind is strictly prohibited. Possession of firearms or any other items intended for harm are likewise prohibited to the maximum extent under applicable law. Any observed or suspected threats, violent behavior, or unauthorized items must be immediately reported to a supervisor, HR, EHS, the hotline, or local law enforcement.

3.2 Discrimination, Harassment, or Disrespect

GPT does not tolerate disrespectful behavior, discrimination or unlawful harassment, including verbal abuse, unwanted advances, or other exclusionary practices. GPT adheres to all applicable laws and regulations requiring equal opportunities in employment, and prohibits discrimination against any individual or group on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, national origin, ethnicity, age, disability, veteran or military status, pregnancy, childbirth or related medical conditions, genetic information, marital status, or any other characteristic protected by applicable law.

4. BUSINESS INTEGRITY

4.1 Conflicts of Interest

All individuals are expected to perform their duties with integrity. Situations where personal interest, whether direct or indirect, conflict with the interests of GPT must be avoided. Even the appearance of a conflict can undermine trust and compromise decision-making. Each individual has an obligation to perform their work for GPT effectively and objectively. Accordingly, individuals should avoid any situations or actions that could give rise to a conflict of interest or the appearance of such a conflict.

An actual or apparent conflict of interest may arise in many ways, including the following:

- **Financial Interests:** Holding ownership or other interest in a competitor or in a business with which GPT has, or is contemplating, a business relationship;
- **Outside Employment:** Maintaining any business, financial or other relationship with third parties if it impairs one's ability to fulfill their responsibilities to GPT;
- **Family Relationships:** Nepotism or favoritism in employment decisions (e.g., hiring, promotions, or assignments) or commercial dealings (e.g., supplier selections or contracts) involving immediate family members (e.g., spouses, domestic partners, parents, siblings, children, or in-laws), without prompt written disclosure to a supervisor, HR, or Legal & Compliance prior to taking any such actions. All potential conflicts must be disclosed to avoid actual or perceived bias;
- **Confidential Information:** Utilizing confidential, commercial, or proprietary information of GPT obtained through the performance of work with or for GPT or otherwise acquired through conversations or observations involving GPT personnel or third parties engaged in commercial relationships with GPT;
- **Employment Relationship:** Serving as an employee, director, officer, partner, agent or consultant for a current or prospective competitor, supplier or customer, where such participation could interfere with responsibilities to GPT. This includes “moonlighting” or providing services to another business as an officer, director, employee, agent, representative, or consultant where one's participation could detract from duties at GPT;
- **Use of GPT Resources:** Devoting work hours or GPT resources to activities unrelated to one's role at GPT;
- **Influence on Decisions:** Influencing or attempting to influence any business transaction between GPT and another entity in which one has a direct or indirect financial interest;
- **Gifts and Hospitality:** Accepting or providing unapproved gifts, favors, hospitality, or anything else of value that could influence, or appear to influence, business decisions;
- **Personal Gain:** Taking opportunities discovered through one's role at GPT for personal gain.

Transparency is crucial in managing potential conflicts of interest. No action may be taken with respect to a potential conflict of interest unless and until it has been fully disclosed and reviewed by the individual's supervisor, HR, or Legal & Compliance, and appropriate guidance or approval



has been provided. By raising any potential conflicts of interest as they arise, individuals help advance GPT's reputation for honesty, integrity and fair dealing.

In many cases, the interest, relationship, or transaction may not be considered harmful to GPT, and individuals may be allowed to pursue it; however, transparency prior to any actions allows for all involved to make the best decision for GPT's interests.

4.2 Accurate Financial and Operational Records

GPT requires that all financial and accounting records are maintained with accuracy, completeness and transparency in accordance with generally accepted accounting principles. No entries may intentionally conceal or disguise the true nature of any GPT transaction. Employees must adhere to the following guidelines to ensure integrity in financial reporting and operations:

- No undisclosed, unrecorded, or “off-the-books” funds or assets may be created for any purpose.
- No false or fictitious entries should be made or misleading reports issued; all entries must accurately and fairly describe the transactions they cover.
- Payments may be made only for actual services rendered or products delivered; false or fictitious invoices may not be paid.
- No document will be dated as of any date other than the actual date of execution unless that document clearly states on its face that the date is to be regarded “as of” a different date. Such “as of” dating must be reviewed by Legal & Compliance to ensure compliance with Legal & financial reporting standards.
- Business expenses properly incurred in performing GPT business must be documented promptly, accurately, and completely in expense reports, clearly distinguishing the type of expense being reported.

Any suspected violation of accounting or financial records requirements must be reported to a supervisor, HR, the hotline, or Legal & Compliance via email at GPTCompliance@grainproteintech.com.

Sound management of GPT's cash and accounts is also essential to prevent bribes, kickbacks and other illegal payments. Employees must adhere to the applicable anti-bribery and anti-corruption policies, in addition to the following requirements:

- All bank accounts containing GPT funds, except accounts in the names of custodians of petty cash funds, should be established and maintained in the name of the appropriate GPT affiliate's legal business name.



- All transactions containing GPT funds should be clearly identified in GPT books and records.
- No funds should be maintained by GPT in the form of cash beyond what is reasonably required for normal business operations. GPT creates a wide range of records and documents in the course of its business, which must comply with all records management policies. Such records may be critical in government audits, legal requirements, investigations, or lawsuits. Employees are prohibited from inappropriately altering or destroying GPT records and must comply with all applicable records retention policies and procedures. GPT may issue a “legal hold” or “litigation hold” requiring the suspension of records management policies and procedures. Any such suspension will be done at the direction of Legal & Compliance.

4.3 Use and Protection of Company Assets

GPT employees share a collective responsibility to protect and properly use the property and funds entrusted to them by GPT. GPT encourages employees to be cost conscious in their work and to continuously seek ways to enhance performance while reducing expenses.

While occasional personal use of GPT property may be necessary, such as personal use of communication systems, employees should generally avoid personal use of GPT property, including office supplies, equipment, computers and vehicles. GPT property must not be used for personal benefit or sold, loaned or given away, regardless of its condition or value, except when an explicit authorization has been granted.

4.4 Protection of GPT’s Intellectual Property

GPT’s intellectual property represents some of GPT’s most valuable assets and serves as the foundation for new product innovations for its customers. Each employee must therefore comply with any intellectual property laws and regulations, as well as any agreements required by GPT, and ensure the protection and proper use of GPT’s intellectual property. Similarly, all employees are expected to respect the intellectual property rights of third parties, including GPT competitors.

4.5 Responsible Use of Artificial Intelligence

The responsible use of Artificial Intelligence (AI) is an integral part of how we conduct business, as an emerging tool that reflects our commitment to ethical innovation and data integrity. Employees must use approved AI tools transparently, ensuring outputs are accurate, unbiased, and aligned with organizational values. This includes protecting sensitive data, avoiding deceptive or manipulative uses, and maintaining human oversight in decision-making. All AI usage must comply



with applicable laws, internal guidelines, and policies. Any use of AI for legal, financial, safety-critical, or employment decisions and use must be preapproved by Legal & Compliance. By following these practices and regularly reviewing AI applications for ethical, legal, security, and other risks, we build trust, accountability, and responsible innovation across our organization.

4.6 Data Privacy and Cybersecurity

GPT is committed to respecting and protecting the privacy and confidentiality of all employees, customers, vendors and other business partners, ensuring information is used only for legitimate business purposes and in compliance with all applicable laws and regulations. Employees are encouraged to consult [GPT privacy policy](#) for more detailed information on privacy practices and obligations.

Cybersecurity is a critical component of our Code reflecting our commitment to protecting sensitive data, systems, and digital assets. All employees are expected to uphold best practices in information security, including safeguarding passwords, avoiding unauthorized access, reporting suspicious activity promptly, and following incident response protocols in the event of a potential breach. Strict adherence to data protection laws and internal protocols to prevent breaches and ensure confidentiality, integrity, and availability of information is essential. By maintaining vigilance and accountability in our digital behavior, we help preserve trust and resilience across the organization.

4.7 Communication and Social Media Guidelines

Employees are expected to use social media responsibly, reflecting GPT's values of respect, integrity, and transparency. Prohibited actions include disclosing confidential information, misrepresenting GPT, or engaging in discriminatory, harassing, defamatory, hostile, or offensive behavior that could damage GPT's reputation or workplace culture.

When discussing work-related topics, clearly identify your affiliation and avoid implying official GPT endorsement, unless authorized. Only authorized spokespersons may communicate with the media, investors, or analysts on behalf of GPT. Any media or external inquiries regarding GPT should be referred to the appropriate communications or Legal & Compliance function. Nothing in this section is intended to restrict or interfere with employees' rights to engage in lawfully protected concerted activity or other rights protected under applicable labor and employment laws.



4.8 Anti-Money Laundering

GPT conducts business only with reputable customers involved in legitimate business activities and with funds derived from lawful sources. GPT is fully committed to complying with all anti-money laundering and anti-terrorism laws worldwide, including compliance with OFAC and similar laws and regulations. Any involvement in money laundering, whether knowingly or not, undermines GPT's reputation for integrity and exposes both the individuals and GPT to significant civil and criminal penalties.

GPT does not conduct business with individuals or entities subject to applicable sanctions or restricted-party lists. Employees must comply with all screening, due diligence, and escalation requirements relating to sanctions and restricted parties.

4.9 Anti-Bribery and Anti-Corruption

GPT upholds a strict policy prohibiting bribery and corruption in any form, any time, to any person, whether involved in the private or public sector. This includes a ban on facilitation payments and requirements for accurate accounting of all payments to prevent improper transactions. Violations of these anti-bribery or anti-corruption laws may result in severe legal penalties and reputational harm, even in countries where such practices might appear customary.

This prohibition also applies to all third parties acting on behalf of GPT, such as contractors, subcontractors, agents, dealers, distributors, and vendors. Employees are required to perform proper due diligence when selecting these partners to ensure, among other things, compliance with anti-bribery and anti-corruption laws.

5. CUSTOMER AND MARKET RELATIONS

5.1 Product Quality

We are dedicated to designing, manufacturing, and delivering reliable, durable, and innovative solutions our customers can count on to make their jobs easier, faster, and more productive. GPT competes by demonstrating integrity in all of its actions, and by bringing together industry-leading brands, deep agricultural experience, and forward-thinking technology to help farmers and agribusiness managers increase productivity, protect what they've produced, and care for their animals.

Every team member is responsible for ensuring our products are safe, dependable, and meet or exceed the standards of our industry. We actively listen to market feedback, respond transparently



to concerns, uphold rigorous quality controls, and are committed to continuous improvement. By doing so, we strengthen trust, foster long-term relationships, and reinforce our reputation for excellence in the marketplace.

5.2 Fair Competition and Antitrust Compliance

GPT is fully committed to upholding the principles of fair competition and strict compliance with antitrust laws. All employees must conduct business ethically and independently, avoiding any agreements or practices that could restrict competition, such as price fixing, market allocation, bid rigging, or sharing sensitive information with competitors. These actions not only violate legal standards but also undermine trust and innovation in the marketplace. We expect everyone to engage with competitors, suppliers, and partners in a manner that promotes transparency and integrity. Any suspected violations must be reported immediately to Legal & Compliance.

5.3 Government Contracting Standards

When engaging with government entities, GPT is committed to full compliance with all applicable laws, regulations, rules, and contractual obligations. All representatives of GPT, when engaged in any communication or other activities with government entities or government officials are expected to:

- Promptly notify Legal & Compliance and follow all guidance;
- Cooperate fully and provide truthful, accurate and complete information;
- Safeguard GPT's legitimate interests.

Employees must inform Legal & Compliance at GPTCompliance@grainproteintech.com upon receipt and before responding to any request for information from a government or regulatory agency, unless otherwise prohibited by law.

5.4 International Trade and Export Controls

GPT operates internationally and must comply with the relevant international and domestic trade laws and regulations including export and import controls, sanctions, anti-boycott requirements, trade embargoes and similar requirements.



Regardless of their roles within GPT, all employees are responsible for adhering to the laws regulating the classification, licensing, end use, recipients and duties related to GPT's exports, maintaining accurate records of such activities.

In the event any employee becomes aware of any request of GPT, from a customer, vendor or any other 3rd party to participate in or condone any economic boycotts of countries, groups or individuals, immediately contact Legal & Compliance at GPTCompliance@grainproteintech.com.

6. SUPPLIER AND THIRD-PARTY ENGAGEMENT

6.1 Ethical Supplier Relationships

GPT's relationships with vendors, suppliers, and subcontractors are essential to its operations and must be conducted with fairness, transparency, and integrity. All commercial dealings shall comply with applicable laws, regulations, and GPT's ethical standards. Relationships involving counterfeit goods, illicit origins or destinations, or any other practices violating legal or ethical norms are strictly prohibited.

GPT promotes competitive procurement to the fullest extent practicable, exercising due diligence and upholding the highest ethical practices in sourcing selection, negotiation, and administration. Vendor, supplier, contractor, and subcontractor selections shall be based on objective criteria, balancing quality, value, and performance. GPT reserves the right to verify supplier compliance through requests for information, audits, or site visits. Non-compliance may result in corrective action plans or termination of relationships.

Appropriate gathering and use of competitive intelligence supports GPT's success, but employees must never solicit or accept competitors' trade secrets or proprietary information. Any such offers or questions regarding the legitimacy of competitive data must be reported immediately to a supervisor, HR, or Legal & Compliance.

6.2 Gifts, Entertainment, and Hospitality

GPT business decisions should be based on objective factors such as quality, service, and price. Employees should ensure that gifts, entertainment, or hospitality do not influence, or appear to influence, their judgement. Modest and customary business courtesy may be acceptable to give or receive when they are both reasonable and appropriate. Employees must refer to the applicable GPT Anti-Corruption Policy or regional guidelines for thresholds, approval processes, and any regional variations prior to providing gifts to non-GPT parties. For questions, please contact Legal & Compliance.



6.3 Human Rights and Labor Practices

GPT has the highest commitment to respecting human rights and combating all forms of slavery and human trafficking. This commitment begins with GPT’s own operations and extends across its global supply chain and in the communities where GPT products and services are sold and used.

GPT’s approach is guided by the following principles:

- Conducting business in a way that respects the dignity and the rights of all people.
- Conducting due diligence on suppliers to assess and mitigate human rights risks in the supply chain.
- Promoting diversity, equal opportunity, non-discrimination in all forms, and fostering a workplace free from unlawful harassment and retaliation.
- Complying with all applicable local health and safety laws and regulations.
- Providing a safe and secure environment for all employees.
- Ensuring fair wages and working hours that comply with local laws and do not exceed reasonable limits; respecting freedom of association and collective bargaining rights.
- Prohibiting child labor, human trafficking, slavery and all other forms of forced or involuntary labor.

GPT suppliers must comply with all applicable laws and regulations and respect the human rights of their employees and the communities in which they operate. GPT will not knowingly conduct business with any individual or entity that participates in human rights abuses. Employees must immediately report any concerns regarding safety, security, or human rights within GPT or GPT’s supply chain to a supervisor, HR, Legal & Compliance, or through the GPT hotline.

6.4 Philanthropy

GPT is committed to making a positive impact in the world and engaging responsibly in charitable activities that benefit the communities in which it operates. GPT may contribute funds, time, talent, or materials to support philanthropic causes. Employees are encouraged, but not required, to become familiar with, and if they wish, participate in the many philanthropic initiatives GPT supports. Philanthropic contributions of direct funds require Legal & Compliance approval.

6.5 Environmental Sustainability

GPT is committed to environmental sustainability and broader ESG principles as foundational elements of responsible business operations. We are dedicated to minimizing our environmental impact through resource-efficient practices, compliance with applicable environmental laws and



regulations, and ongoing efforts to promote and increase sustainable agriculture. This includes a focus on reducing carbon emissions and conserving water and energy in the communities where we operate. This approach also includes minimizing the use of hazardous substances, obtaining necessary environmental permits, and identifying reportable materials in compliance with applicable regulations. As our ESG framework evolves, we will continue to assess and enhance our strategies to align with global standards, ensuring long-term value for our stakeholders while contributing positively to the planet.

6.6 Conflict Minerals

GPT supports efforts to end violence associated with conflict minerals and complies with applicable regulations regarding responsible sourcing. Suppliers must assess and mitigate risks related to sourcing minerals from conflict-affected areas, ensuring transparency in their supply chains where such minerals are used in products provided to GPT.

7. POLITICAL AND CIVIC ENGAGEMENT

7.1 Guidelines for Political Activities

Political contributions and lobbying are heavily regulated and may be subject to special legal requirements. Any business unit considering a political donation, hiring a lobbyist, or engaging in any lobbying activity must first consult with SVP, Global Finance (or designee), and Legal & Compliance.

GPT encourages employees - acting solely in their personal capacities, on their own time, and utilizing their own resources - to become engaged in their communities and in the electoral process at the local, state, regional and national level. When engaging in personal political or community activities, the following principles apply:

- Do not use GPT time, property, funds, or equipment to carry out or support personal activities, whether political or otherwise.
- Always make it clear your views and actions are your own, and not those of GPT.
- Anyone intending to seek or accept public office must notify their supervisor in advance to discuss whether any potential material conflicts from official duties might affect their work, and to work with their supervisor to ensure that job responsibilities at GPT are not negatively impacted.
- Employees are prohibited from pressuring or coercing colleagues to support a political candidate, a political party, or charitable cause.



- In the event these requirements conflict with applicable law, the applicable law shall control.

8. POLICY ADMINISTRATION

8.1 Reference to Supporting Policies and Procedures

GPT maintains an intranet site with additional information about this Code, other policies and guidelines together with other ethics and compliance matters which can be located on GPT Hub. If you do not have access to the intranet site, ask GPT's Human Resource Department.

8.2 Resources for Guidance and Support

There are many resources available to answer questions and address concerns about potential violations of the law, this Code or other GPT policies, including:

- Your supervisor or HR representative.
- GPT's Legal & Compliance Department - GPTCompliance@grainproteintech.com.
- Hotline (report online or by phone): <https://gpt.ethicspoint.com>.

8.3 Policy Review and Updates

The Legal & Compliance Department is responsible for the revision and periodic updating of the Code of Conduct. This Code shall be reviewed at least biennially, or more frequently as required by changes in law, business operations, or regulatory requirements.

8.4 Continuation and Modification

GPT reserves the unrestricted right, consistent with the law, to review, reconsider, interpret, amend, modify, suspend or discontinue all or any portion of such policy, plan or program at any time, with or without notice. If any provision of this policy conflicts with or violates any applicable law, regulation, or other legal requirements, the provisions of those requirements will control.

In the rare circumstances where a waiver or an exception of the Code may be appropriate, contact Legal & Compliance immediately at GPTCompliance@grainproteintech.com.

This Code is not intended to provide legal advice. Employees should consult with Legal & Compliance for specific guidance on any matter.



**QUESTIONS REGARDING THIS POLICY GUIDE SHOULD BE REFERRED
TO THE LEGAL & COMPLIANCE DEPARTMENT**

Description	Effective Date	Change Made By Name and Title
Policy Creation	01/01/2026	Patrick Rykhus, GC