



ECOM Agroindustrial Corp. Limited and its group companies (together, “**ECOM**”) is committed to conducting its business in an ethical, legal, environmentally and socially responsible manner. ECOM continuously works to improve the sustainability of its operations. While our policies ensure that we comply with applicable laws, our actions demonstrate our commitment to invest in the wellbeing of our employees, the protection of the environment, while enhancing traceability and expanding the development of sustainable production programmes. We expect our suppliers to share our commitment to doing business in a responsible, sustainable and ethical manner and set out below our Supplier Code of Conduct (the “**Code**”) with which our Suppliers must act in accordance.

LEGAL & ETHICAL COMPLIANCE:

ECOM conducts its business in compliance with all applicable laws, rules and regulations including antitrust laws, applicable sanction regimes and is not engaged in bribery, corruption, money laundering or other fraudulent practices. We expect the same from our Suppliers and a Supplier must have in place policies and procedures to ensure such compliance.

HUMAN RIGHTS & LABOUR:

Respect for employment contracts: Suppliers must ensure that all employment contracts are fair, clear and understood by workers. **Child labour and modern slavery:** We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains or in any part of our business. We adhere to (i) the United Nations Universal Declaration of Human Rights, (ii) the International Labour Organisation core labour conventions 29 and 105 (Forced Labour), 182 (Worst Forms of Child Labour) and 138 (Minimum Age), and (iii) applicable laws governing child labour, slavery, forced or compulsory labour and human trafficking. We comply with local laws regarding minimum employment age and do not employ children who are under the local minimum school leaving age. We expect the same commitments from our Suppliers. Suppliers must not engage in or support the use of forced, bonded or involuntary prison labour. Workers should be free to leave their employment after reasonable notice. **Indigenous Peoples & Communities:** We strive to follow the principles of Free, Prior and Informed Consent (FPIC) when operating on Indigenous Peoples’ lands or where their interests are concerned. We expect our Suppliers to follow these same principles. **Abuse:** We do not permit the use of violence or any form of harassment, abuse or intimidation in any of our operations, and we strive to ensure our employees are treated with dignity and respect. Our Suppliers should also operate in this way and disciplinary practices should be fair and in line with internationally recognized human rights standards. **Discrimination:** It is our policy that no job applicant or employee receives less favourable treatment on the grounds of sex, gender, gender identity, sexual orientation, age, race, colour, nationality, ethnic origin, religion, belief, disability, marital status, pregnancy status, caregiving responsibilities or by conditions which cannot be shown to be justifiable. In addition, we are committed to granting all workers Freedom of Association so that any employee who is associated with any collective bargaining or trade union does not receive less favourable treatment as provided for in ILO Conventions 87 (Freedom of

Association) and 98 (Right to Organise and Collective Bargaining). Our Suppliers should respect the right of workers to form and join trade unions and bargain collectively. No worker should be subject to discrimination. **Diversity and inclusion:** We are committed to ILO Conventions 100 (Equal Remuneration) and 111 (Discrimination) and expect the same from our Suppliers. Our Suppliers are expected to value the dignity of each employee as a unique person with individual skills and perspectives. Suppliers are expected to categorically reject individuals and ideologies that seek to sow hate, discord, and division based upon an individual’s personal characteristics. **Reasonable hours & compensation:** Our employees have regular, reasonable working hours and we expect our suppliers to pay their employees reasonable compensation and benefits that, at a minimum, comply with all applicable laws and regulations, including in relation to overtime pay. Wages should be paid regularly, in full, and without delay.

HEALTH AND SAFETY:

Our policy is to comply with ILO Conventions 155 and 187 (Occupational Health and Safety) and applicable laws by taking all reasonably practical steps to safeguard the health and safety at work of all our people, and the safety of our customers, suppliers and all others who are affected by our activities. Our Suppliers are responsible for providing a safe and healthy workplace in accordance with applicable laws and international standards and work towards safeguarding the health and safety of their employees. Workers should receive adequate safety training and have access to necessary protective equipment

SUPPLY CHAIN RESPONSIBILITY:

Traceability: By investing in supply chain intelligence, we are continuing our on-going commitment to our customers to provide fully traceable and sustainable commodities. We expect our Suppliers to have enhanced levels of control and transparency to assist us in our commitment to provide traceability throughout the supply chain. ECOM reserves the right to ask for a full supply chain map to facilitate risk assessments and gauge legal, ethical and environmental compliance in the upstream supply chain. Our suppliers will be transparent about all known farms/coops/buying stations used to source goods for us and provide such information upon request. **Sustainability:** We are committed to improving the quality of our farmers’ yields, quality of product and, in turn, their income. Every local market is different, but where possible this will include: (i) engaging with farmers directly and through farmer organisations; (ii) training to improve agricultural, social and ethical



practices; (iii) certification or verification programs to enable trade in higher value markets; (iv) access to farmer services including but not limited to inputs, credit, better plant genetics and technologies. We expect our Suppliers to engage in and be supportive of such sustainability practices. **Continuous improvement:** We recognise that achieving the requirements of this Code is a dynamic process and we encourage continuous improvement within a Supplier's operations. In cases where improvement is required, we will support our Suppliers to establish clear milestones and processes to support their achievement. **Grievance reporting:** We provide a platform through which all ECOM employees, contractors, sub-contractors, agents, customers, suppliers and other stakeholders may report to ECOM any concerns, complaints or potentially unlawful activities in the workplace or relating to ECOM operations, with the option to do so anonymously, without threat of reprisal, intimidation or harassment (see below for more information). We encourage and expect our Suppliers to encourage and provide means for their employees, contractors and suppliers to likewise be able to make any such reports, and to be able to do so anonymously, without threat of reprisal, intimidation, or harassment. Any report must be treated in confidence. Suppliers must investigate such reports and take corrective action if needed and notify ECOM of legal actions, administrative investigations, or prosecutions that may affect their performance of any contractual obligations to ECOM, or where such legal actions could adversely affect a Supplier's or ECOM's reputation.

ENVIRONMENT:

We are committed to improving the environments in which we operate; as a minimum, we expect our Suppliers to comply with environmental laws, hold required permits, to strive to improve environmental practices and minimise the environmental impact of their operations. **Greenhouse gas emissions:** Our Suppliers will take appropriate steps to minimize greenhouse gas (GHG) emissions and its impact on climate change and air quality. Suppliers should collect GHG data, assess and reduce their emissions and provide documentary evidence of this to ECOM if requested. **Energy efficiency:** Our Suppliers will take appropriate steps to minimize the consumption of energy as well as put in place energy saving strategies (i.e., use of renewable sources and fuels, fuel-efficient logistics operations). **Water management & conservation:** Our Suppliers will take appropriate steps to minimise their impact on water by: (i) reducing their water

consumption; (ii) ensuring groundwater quality is maintained; (iii) ensuring discharged wastewater qualities comply with local regulations and are (where possible) improved; and (iv) by supporting water conservation. **No deforestation:** Our Suppliers will take appropriate steps to ensure their operations do not contribute to deforestation, forest degradation and biodiversity loss. When establishing new operations or expanding existing ones, our Suppliers shall obtain all legal approvals and permissions. Our Suppliers will be transparent about land use history and maintain supporting documentary evidence, including any geolocation data. Our Suppliers shall provide such information, along with any declarations required by applicable regulations, upon request by ECOM.

AUDIT:

At any time during our business relationship with you, we reserve the right to audit you, your suppliers and subcontractors for compliance to this Code, and you shall accommodate our audit as required. As part of any audit, we or any of our representatives or agents may require access to your facilities and all relevant records associated with the products and services you provide to us. We shall agree with you a mutually agreeable date and time for access. However, risks to our business may require immediate access to the products, services, and associated records, and you shall accommodate our reasonable access as needed. You shall contractually require your suppliers and/or subcontractors to conform to standards equivalent to the provisions of this Code. You shall also ensure that your personnel shall comply with this Code when providing goods or services to ECOM.

BREACH AND CORRECTIVE ACTION PLAN:

If, during our business relationship, we find that you are not in compliance with the obligations or spirit of this Code, we reserve the right to negotiate a 'Corrective Action Plan' with you, or in case of serious or persistent violations, to terminate the business relationship. Where possible, we will agree the Corrective Action Plan with you, so that we can work together, at your cost, to mitigate any consequences of non-compliance and to remediate the non-compliance itself. Where possible, we will provide guidance and resources to help improve your due diligence and risk mitigation processes. We reserve the right to terminate our business relationship if you do not take reasonable steps to implement the Corrective Action Plan to our satisfaction.

To report any concerns relating to this Code or our business relationship, you can reach out to your ECOM contact or, if you prefer, through our secure, anonymous platform (<https://ecom.speakup.report/en-GB/ecom/home>) or via email at ecomspk@ecomtrading.com.

Through supplying or providing services to ECOM, you confirm that you comply with the above principles. This Code goes beyond compliance with the law and aims to advance social and environmental responsibility.

ECOM will review this Code on a regular basis and will introduce revisions where necessary or appropriate. Suppliers will always find the most up to date version of the Code on the ECOM website at <http://www.ecomtrading.com>.