



SUSTAINABLE
MANAGEMENT
SERVICES

SMS Code

Management System (SOP)- Public version
November 2024



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SOP INTRODUCTION

1.Introduction.

Sustainability is a key factor in ensuring the supply of raw materials in the global coffee supply chain. ECOM, fully aware of this reality, developed a program through its department of Sustainable Management Service (SMS) that allows producers and customers to access quality coffee, produced in compliance with social, environmental and quality aspects.

This program is named after the SMS Code, which establishes basic lines for sustainable coffee production, for all actors involved: producers, technicians, farms and roasters. The SMS Code includes four dimensions: Economic Transparency, Productivity and Quality, Environmental Responsibility and Social and Labor Responsibility.

The following are set out for ECOM countries interested in implementing SMS Code.

Objective:

To outline the general guidelines for the implementation of the SMS Code.

Reach:

This document sets out the scope of the applicable regulations and procedures regarding country training, definition of business proposals, data capture, presentation of results, inclusiveness of stakeholders, systems used, among others.

To whom it is addressed:

The guidelines set out in this document are aimed at the actors involved in the definition, implementation and submission of results relating to the SMS Code, namely:

1. Central Administrator SMS Code Program.
2. SMS Department.
3. Roasters.
4. Commercial Departments
5. Producers.
6. Stakeholders.

2. Key terms and definitions.

Below we set out the most important terms and definitions use in the document.

SMS	Sustainable Management Service.
SMSi	SMS Integrity – System developed by ECOM to include information on the agronomic management of farms and producers.
Basic Criteria	Mandatory compliance criteria from year zero of the program.
SMS Drivers	Criteria focused on Productivity and Quality; it does not have specific year of implementation.
SMS Code short version	Evaluation tool with 77 criteria.
SMS Code long version	Evaluation tool with 194 criteria.
SMS Code status	Status achieved according to note obtained in an SMS Code evaluation.
Local SMS	Local SMS team at origin.
CT	Country trader.
SMS CM	SMS country manager.
GCC	Global SMS Code Coordinator.
SMS technicians	Agronomists responsible for implementing SMS Code in the field.

3. ECOM's Sustainable Management Services (SMS).

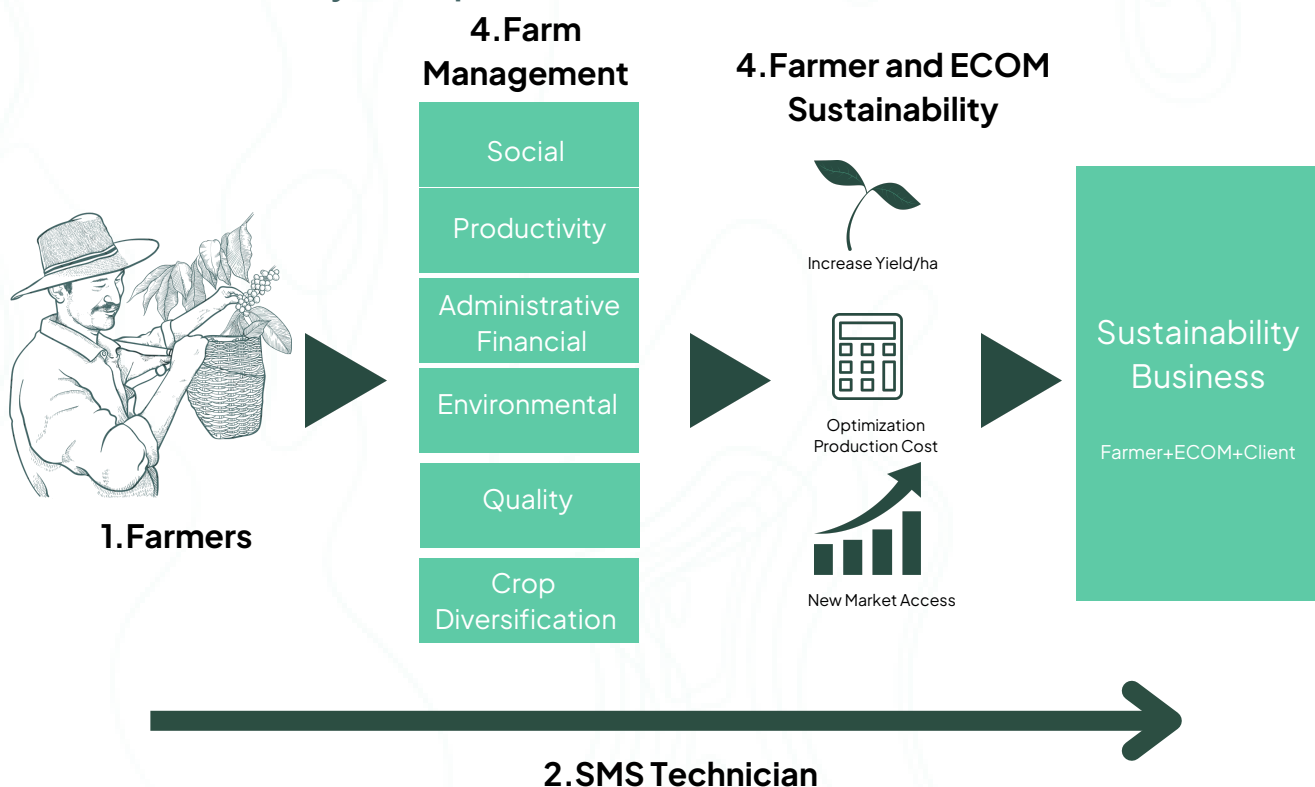
3.1. SMS Vision

ECOM's Sustainable Management Services (SMS) is committed to be the premier provider of socially & environmentally responsible and innovative solutions to farmers across the world. SMS' vision translates into three key missions:

- To deliver higher-quality products that enable farmers to increase their overall farm productivity.
- To provide high-value services, including training, input and technology access to improve markets for bottom-of-pyramid participants.
- To create a sustainable, profitable value chain by providing the best services to all stakeholders.

SMS implements sustainability programs and provides products and services for rural populations across 23 countries.

3.2. SMS Sustainability concept.



For SMS, farmers are the most important actors in the value chain. Farmers must be assisted by a technical team that can transfer knowledge and technological support. SMS identifies areas of improvement for the farm. If the farmer manages to get a good management of his/her farm, he/she can comply with the 3 basic objectives of SMS: Increase Yield/Ha; Optimization of production cost; New market access. In relation to new markets, SMS wishes to give farmers a new strategy to sell coffee at a better price. As such, productivity efficiency and new markets are at the core of SMS's sustainability concept.



**SMS CODE
Program
Organization.**

4. SMS Code.

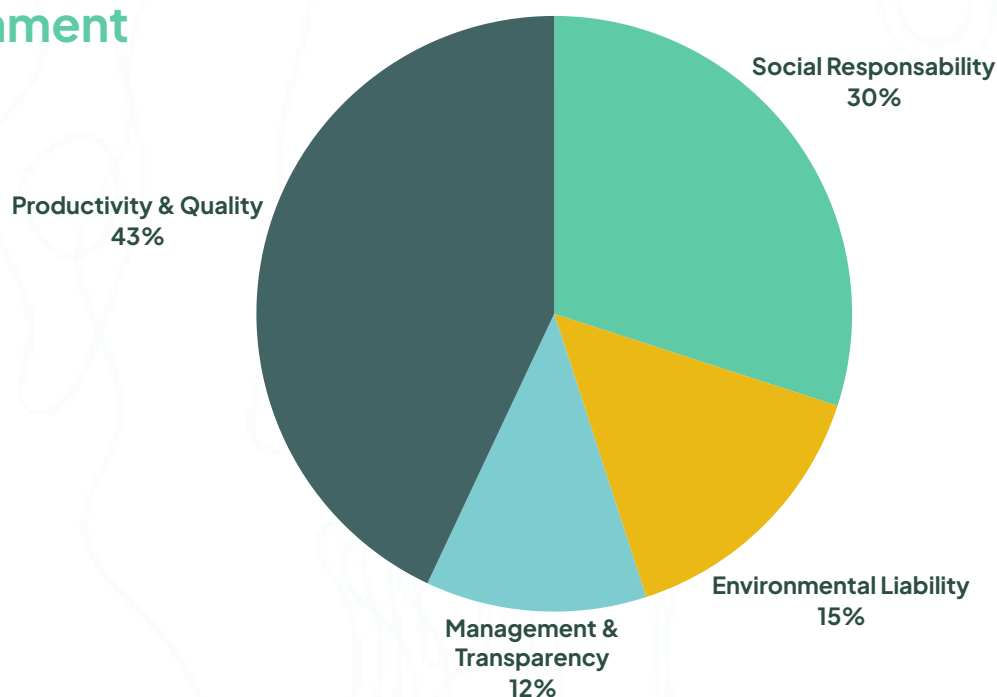
4.1. SMS Code as a sustainability tool for the value chain

Instead of offering a certification system, SMS developed the SMS Code to enable a tailored, continuous sustainability improvement and benchmarking program for roasters looking for impact at the farm's gate.

SMS Code is different from certification because it:

- Includes production and quality concerns not usually included in traditional certification programs.
- Focuses on the continued betterment of the farmer's production.
- Provides high value-added technical feedback visit after visit (unlike certification)

SMS Code Program: Distribution of Criteria per Fundament



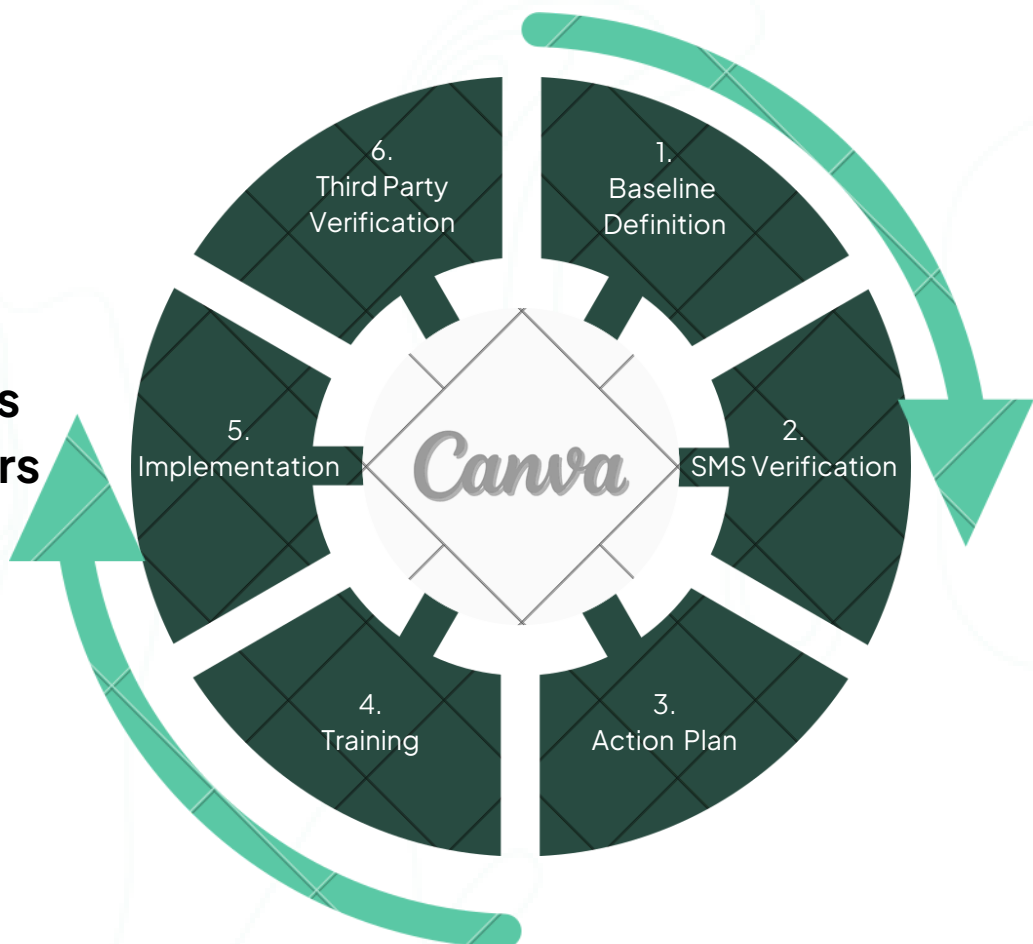
SMS Code enables roasters to reach new levels of impact at farmer-level through the portfolio of SMS services and SMS Integrity (SMS' big data platform), giving roasters access to near-live field-data to monitor program progress and pilot their own supply-chain impact.

SMS Code adapts itself to both roasters' requirements and to the challenges at the farm-level to secure coffee quality, empower farmers and to monitor roasters' supply chain.

4.2. SMS Code Cycle

We designed the SMS code to enable farmers to enhance their productive capabilities throughout the Code's lifecycle. The SMS Code follows the steps as per the graph below. We explain each step-in detail.

Sustainable Management Services provides support to farmers with a goal of continuous improvement



1. Country-specific SMS team identifies a group of farmers with which to work (baseline).
2. SMS team visits farmers for evaluation of different aspects of the farm management.
3. According to the results from 2. SMS team establishes an action plan for improvement.
4. According to 3. SMS team defines training needs for the farmer(s).
5. SMS team implements training sessions with the farmer(s).
6. In case a client wishes to have an external audit of the Code they may pay to have it done (see Section 1.18).

4.3. SMS Code structure.

SMS Code is also built around four main pillars:



4.3.1. Fundamentals Description.

- Management & Transparency: detailing the sourcing of coffee from origins, assessing and ensuring quality and quantities.
- Productivity & quality: evaluating production and agronomic (renovation, fertilization, pruning...) indicators to ensure that farmer can increase productivity and quality on the long run.
- Environmental Responsibility: environmental indicators (wastewater treatment, river contamination, flora and fauna protection...) to ensure the coffee we purchase has a positive/neutral impact on the environment.
- Labor & Social Responsibility: indicators (related to child labor, forced labor working hours, minimum wage) are developed to ensure that the coffee we purchase does not undermine farmer's rights.

4.3.2. SMS Code Criteria Type.

SMS Code is structured around 3 types of criteria:

Basic Criteria

Criteria must be implemented from year 0. If a farm does not comply with at least one critical criterion, SMS Code Provisional status is assigned. Farmers can't be in a Provisional status for more than one year.

Critical Criteria

Areas Evaluated at farm- level



SMS Code Basic Criteria Description:

Fundament Management and Transparency

Suppliers:

All farms comply with the SMS Code Basic Criteria for suppliers including social, environmental, and social aspects.

Internal Inspection:

All farm received an annual SMS Code Inspection done by SMS Team.

Coffee Traceability:

Farms have coffee documentation to demonstrate traceability from the field to the processing units and exportation process.

Farmer Commitment:

All farmers have signed a commitment to comply with the Code Program.

Trainings:

Farmers participate on trainings related to social, environmental, economic and productivity aspects.

Fundament Productivity and Quality

Agrochemical use: Use of authorized products in the country and reduction of herbicide in renovation coffee areas.

Prohibited products: All farms do not use prohibited products in coffee production, see reference of :

1.1. Prohibited pesticides list

SMS Code Program defined the list of prohibited pesticides according to Coffee Sustainability Reference Code- Annex Pesticide List Reference Code - Annex Pesticide List

https://www.globalcoffeeplatform.org/wp-content/uploads/2023/08/CSRC21_ANNEXPESTICIDES-LIST_2023.pdf

1.2. Use of pesticides in the Phase-out List

SMS Code Program defined the use of pesticides in the Phase-out List are reduced through use of Integrated Pest Management and phased out by 2030, if feasible. This includes pesticides that are classified by national and international regulatory agencies

https://www.globalcoffeeplatform.org/wp-content/uploads/2023/08/CSRC21_ANNEXPESTICIDES-LIST_2023.pdf

Farm Management Plan: Farms have a management plan according to weather conditions, varieties, location, soil conditions and productivity.

Water use: All farms comply with water usage requirement for irrigation.

Fertilization plan: All farms defined fertilization requirements according to soil analysis and variety.

Cover crops: All farms implemented cover crops in order to reduce the herbicide consumption and promote organic matter on the soil.

Fundament Environmental Responsibility.

- Waste Management: All farms have a system to managing waste and protect water sources and ecosystems.
- Natural Resources Conservation: All farms have implemented actions to avoid hunting and extraction of plants in forest or natural areas.
- Sewage water All farms used the appropriate system to manage the sewage water.
- No Ecosystem Destruction: All farms do not convert forest to coffee plantation since January 2014.
- Climate change: All farms collected information related to climate change and defined action to reduce the affectation in the time.

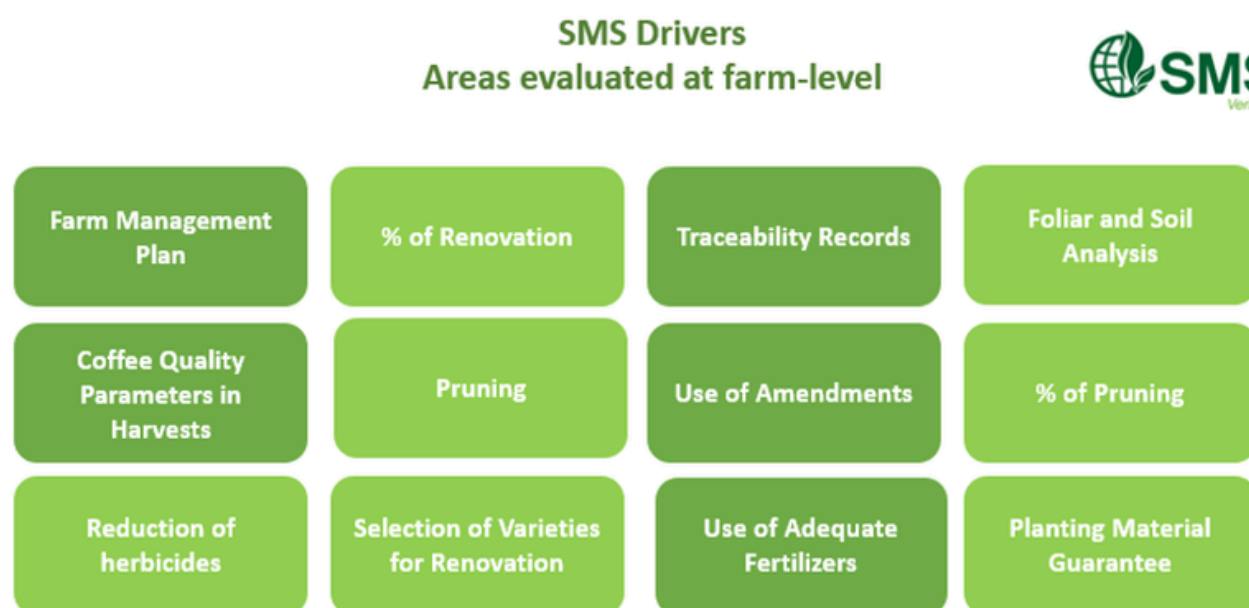
Fundament Social and Work Liability

- No Child Labor: Farms do not contract children.
- No Forced Labor: Farms do not coerce workers to work through the use of violence, intimidation debt, retention of identity papers, or any other threats under the ILO Forced Labor definition.
- Minimum Wage: All farms pay the minimum national salary to the permanent and temporary workers.
- Working hours: Permanent and temporary workers do not work more than 60 hours per week.
- Access to Education: All children living on the farm have access to education.
- Non-Discrimination Practices: All farms have implemented practices against discrimination for all workers (permanent and temporary).
- Access to potable water: All farms provide potable water to the workers (permanent and temporary).

- Safe management of Agrochemicals: All farms have implemented practices to guarantee safe management of agrochemicals.
- Freedom of Association: All farms guarantee freedom of association for all the workers (permanent and temporary).

SMS Drivers.

SMS drivers are SMS criteria focused on productivity and quality. SMS Drivers' compliance is not mandatory but may contribute to a significant increase of productivity for farmers. It does not have specific year of implementation.



These criteria are developed by the Global SMS team and are reviewed annually. All stakeholders are free to suggest or request the addition of specific standards that complies with their business plan or with another certification program, as it has already been done in the past. Stakeholders' contribution strengthens our certification scheme and are highly valued by ECOM.

Productivity.

Renovation: Farms renovate at least 5% of coffee productivity area by year.

Pruning Practices: Farms implemented pruning practices on unproductive coffee plants.

Use of new coffee varieties: Farms used new coffee varieties to increase productivity and resistance to pest and diseases as leaf rust.

Farm Management Plan: Farms have implemented a farm management plan adapted to farm conditions and productivity goals.

Soil conditions.

Soil Analysis: Farms implemented soil analysis at least every 3 years.

Fertilization plan: Fertilization plan is adapted according to coffee varieties and farming conditions.

Amendments use: Farms implemented use of amendments to increase fertilization efficiency.

Herbicide reduction: Farms have reduced herbicide use on renovation areas.

Precision Agriculture

Mapping: Farms have polygon completed.

1.3. Exceptions

Depending on the country where the SMS Code is implemented, exceptions to certain SMS Criteria may be applied. Exceptions or local interpretations are submitted by ECOM country sustainability Manager and revised by SMS Code Global Coordinator and SMS Coffee Global Manager. Example: SMS 2.1.2 “Farms that deliver wet parchment or dry parchment coffee must know quality parameters such as moisture content, physical defects, relevant residue limits”. In Costa Rica, 100% of farms delivery coffee in cherry state, that is, not in the form of parchment.

All the exceptions accepted have to be communicated by SMS Code Global Coordinator on a formal document, it includes:

- Name of the country.
- Number of SMS Code criteria.
- Justification of change request.
- New content interpretation.
- Date of publication.
- Applicability.

1.4. SMS Code status.

SMS Code is built around a three-level approach, with each level referring to a different compliance status. We explain them below.

1.4.1. SMS Provisional.

Initially, regardless of whether the short or long version applies, a farm is considered to have the Provisional status if it does not comply with 100% of SMS Basic criteria (see Section 1.7 above).

A farm cannot have the Provisional status for longer than a year. If it does, the SMS Country head can decide to either keep the farm for another year or take the farm off the program. Coffee from farms in Provisional status cannot be sold as SMS Verified.

SMS Team will track improvements at farm level with SMS Integrity System where in Technical Assistance Module SMS Agronomist can create SMS Visit and SMS Action plans. On this module every improvement is collected on the system. Attached example of SMS Action Plan for a farmer.

Farmer 1

Action Plan

Implementation Ranges		
Greater than 67	Between 34 and 66	Less than or equal 33
✓	→	✗

Priority: High						
Criteria	Findings	Recommendations	Implementation Date	Responsible	Advance	
Agronomic	Se observa problemas de erosión en área de siembra nueva y en áreas con pendiente.	Se recomienda elaborar terrazas para evitar erosión en lomas con pendiente pronunciada y terminar siembra de vivero en orillas de cañón.	9/1/2020	Fernando Segura	60 %	→
Social	La bodega no se encuentra rotulada el día de la visita.	Rotular bodega para evitar confusión al realizar una mezcla. Muy importante el rótulo de la entrada a la bodega para tomar precauciones al pasar cerca de esta zona.	6/11/2020	Fernando Segura	75 %	✓

Farmer 2

Action Plan

Implementation Ranges		
Greater than 67	Between 34 and 66	Less than or equal 33
✓	→	✗

Priority: High						
Criteria	Findings	Recommendations	Implementation Date	Responsible	Advance	
Social	No todas las viviendas de cogedores cuentan con las iluminación adecuada.	Productor está en proceso de remodelación de los baches, dentro de dichas mejoras está contemplado la iluminación y ventilación de las mismas. Quedó en realizar un documento donde especifica las fechas en las que espera tener listas las mejoras.	1/30/2022	Andrey Gutiérrez Alfaro	85 %	✓

1.4.2. SMS Verified

SMS Verified is SMS Code's second level and is focused on improving a farm or cluster of farms' essential value drivers: productivity and quality.

For a farm or cluster of farms to have the SMS Verified status it must:

- Comply with 100% of the 48 critical criteria.
- Evaluate 29 drivers' criteria relating to Pest Management, Nutrition, Pruning and Renovation.

In addition to the 77 criteria requirements listed above, SMS Verified also involves two farm visits per year and requires access to consolidated farm, farmer, and household basic information. This data allows for progress to be tracked online on the SMS Code module built in SMSi.

Logo to identify SMS Verified farms on SMS Code reports:



1.4.3.SMS Diamond Verified

SMS Diamond Verified is SMS Code's third level and is focused on delivering a holistic improvement system dedicated to further improving farms' essential value drivers as well as strengthening their environmental responsibility.

For a farm or cluster of farms to be SMS Diamond Verified, it must:

- Comply with 100% of the 48 critical criteria.
- Evaluate 29 Drivers' criteria relating to Pest Management, Nutrition, Pruning and Renovation.
- Comply with over 70% of score.

In addition to the 192 criteria requirements listed above, SMS Diamond Verified also involves two farm visits per annum and requires access to consolidated farm, farmer, and household basic information as well as additional information upon client request. This data allows for progress to be tracked online on the SMS Code module built in SMSi.

Logo to identify SMS Diamond farms on SMS Code reports

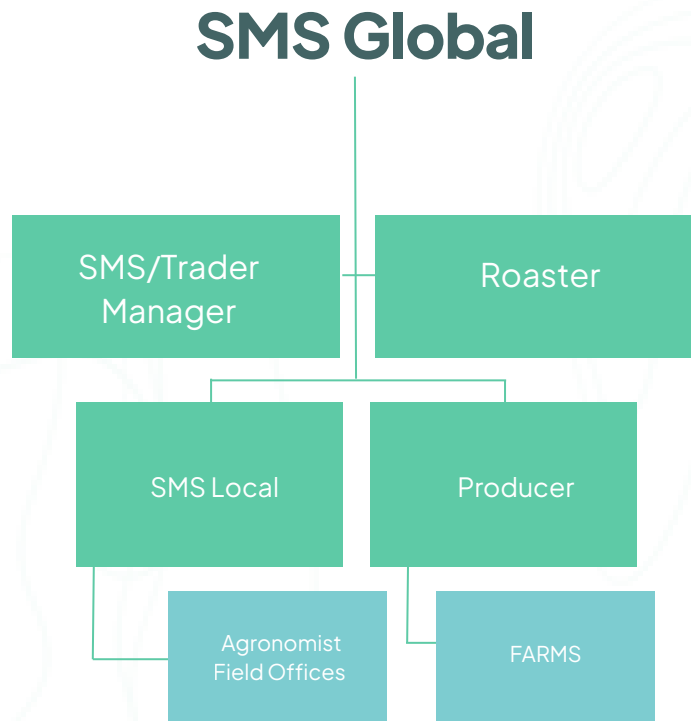


A man with a weathered face, wearing a blue long-sleeved button-down shirt, blue jeans, and a blue bucket hat, stands outdoors. He is holding a thick, textured wooden staff vertically with both hands. The background is a blurred natural setting with green foliage and grey rocks. The text 'SMS CODE GOVERNANCE' is overlaid in white on the lower left side of the image.

SMS CODE GOVERNANCE

2. SMS Code Governance.

2.1. SMS Code Governance structure.



2.2. Roles and Responsibilities SMS Local staff and SMS Global staff.

2.2.1. SMS Global.

SMS Global is responsible for the strategic development, documentation, and implementation of the SMS Code across SMS origins. SMS Global operates at three levels which we describe below.

1st level implementation:

- Defines the content/model of the SMS Code (long/short).
- Defines which report (output) to use.
- Defines the system and way a country may implement the code.
- Trains the relevant teams in country/countries where the Code will take place.

2nd level promotion of the code.

- With traders at ECOM level with SMS managers. It includes official communication about SMS Code content, marketing strategy and other.

3rd level client coordination:

- SMS Global provides support to origins in the production of the reports for clients.

2.2.2. SMS Local.

SMS Local teams oversee the implementation of the SMS Code at two levels which we describe below.

A) Program-level

SMS Local team defines with the origin's commercial unit the group of farmers / farms to be included in the SMS Code program. They define the budget, purchase premium, and SMS fees with the commercial team.

B) Farm-level.

SMS Local team implement the Code with farmers which involves the following tasks:

- Coordinate with SMS Global to give its technicians the appropriate SMS Code training.
- Conduct the Code's evaluation(s) in the farms involved via farm visits.
- Ensure that the technicians' tools (mobiles/SMSi platform...) are working properly.
- Revise the evaluations' results.
- Coordinate with SMS Global for the preparation of the report (see Section 2.11 for more details)
- Present report to client
- Define an implementation proposal for the following year.

2.3. Clients' roles.

Two scenarios:

1. Pre-program.

Prior to the start of the SMS Code program, the interested client defines the country, budget and what they want to do with the targeted producers (SMS premium/technical visits), along with information on the number of producers they want to reach and volume they will purchase.

2. During program.

During the program's lifetime: annual meeting for results presentation; areas for improvement; decide whether they want to continue with the program, if so: clients define budget scope, number of farms, volume.

We note that if the client wishes further clarifications on whatever aspects of the reports content, 'they can ask the country SMS manager. Depending on the clients' request the SMS country manager may liaise with SMS Global to review the situation.

2.4. Stakeholder inclusion.

The inclusion of actors in the definition and implementation of the program is key for the SMS Code, producers, technicians, agronomists, managers, roasters, NGOs and other interested parties. For this purpose, SMS has designed the follow-up procedure to include the different actors in the decision making of the program.

2.4.1. Producers.

Technical SMS teams at the origins must explain SMS Code producers the objectives at least once a year, as well as the scopes and thematic areas of the program (Critical Criteria and SMS Drives).

In addition, the Local SMS team in the country must explain to each producer prior to the annual evaluation the areas to be evaluated on the farm, as well as the possible status according to the note obtained.

In addition, the local SMS team will carry out a consultation process with each of the SMS Code producers to have continuous feedback of the program. Such consultation shall contain at least the following elements: relevance of areas assessed according to national coffee reality, level of implementation of the program and possible topics or areas to be included for future years in agronomic, productive and market issues. SMS Code local teams will be responsible for querying, analyzing the information and proposing to the SMS Global team possible improvements to the SMS Code program.

Feedback received by member producers should be shared by the Local SMS team with the leader of the SMS Code Program (Global SMS) via email or face-to-face/ virtual meeting. Both parties (local SMS-SMS Global) will assess the relevance of including the topics discussed and making changes to the program.

With this feedback, producers can request to the SMS Local team the areas to evaluate at farm level according to the reality of the farm and the country.

2.4.2. Technician/agronomist – SMS Local.

Similarly, technicians and agronomist's member of the Local SMS team may suggest or provide SMS Code feedback to members of the SMS Global team.

These improvement proposals can be forwarded to the Global SMS team via email. Subsequently, on a joint basis, SMS Local – Global SMS will determine the relevance of including the submitted proposals.

This feedback can be made according to the thematic scope, namely:

- Content
- Areas to be evaluated: Critical Criteria – SMS Drivers
- Productivity and quality
- Evaluation process
- SMS Code evaluation results

2.4.3. Clients.

SMS Code Program customers will also be able to provide feedback on the program. To accomplish this purpose, The SMS Local-SMS Global teams must hold at least once a year a follow-up meeting of the program with the client. This meeting is usually held once the SMS Code evaluations have been carried out. The customer will have the freedom to provide feedback on the program on subjects such as:

- Content and areas to be evaluated: Critical Criteria – SMS Drivers.
- Productivity and quality.
- Evaluation process and SMS Code evaluation results.

2.4.4. NGOs and other interested parties.

SMS Code Program also considers the mapping of stakeholders in the coffee industry who influence or are impacted by coffee production, distribution, and consumption. Some examples identified by our program:

- **Non-Governmental Organizations (NGOs):** Groups focused on improving sustainability, fair trade, environmental protection, and labor conditions in the coffee industry. Government
- **Agencies:** Regulatory bodies that oversee trade, taxation, agricultural practices, environmental laws, and labor standards.
- **Certifying Bodies:** Organizations that certify coffee as fair trade, organic, Rainforest Alliance, or other sustainability standards.
- **Financial Institutions:** Banks, microfinance organizations, or investors who provide loans or funding to coffee producers or businesses.

2.5. SMS Code implementation process.

2.5.1. Chain of command.

1. When the client wishes to kickstart a SMS Code project:

- a. Client emails country manager (CM) or country trader (CT) and defines origin, volume, quality and price.
- b. CM or CT contacts SMS country manager (SMS CM) to discuss client's requirements.
- c. SMS CM elaborates SMS Code proposal for client (doc templates archive)
- d. CM / CT reviews proposal and send it to client.
- e. If client unsatisfied by proposal, asks CM / CT to rework proposal (price/ volume/region quantity of farmer).
- f. If client satisfied by proposal, confirms with CM / CT.
- g. Upon confirmation, SMS CM contacts Global SMS Code Coordinator (GCC) to inform that a new client project has been confirmed and discuss implementation.
- h. SMS CM starts SMS Code project.

2. When a SMS Code project is starting and ongoing:

- a. SMS CM contact GCC to define training for the SMS team responsible for implementation of the Code (see Section 7.7 on training).
- b. SMS CM and CM / CT define field evaluation dates.
- c. SMS CM contacts SMS technicians to conduct data gathering.
- d. SMS technicians conduct field evaluations.
- e. SMS CM informs GCC that evaluation(s) has been completed

- f. GCC starts with analysis of data (see section 2.9).
- g. GCC contacts SMS CM to present results
- h. SMS CM approves results.
- i. SMS CM present results to Client.

2. Following completion of a SMS Code project

- a. If Client seeks further information on specific points, Client contacts CT.
- b. CT contacts SMS CM to provide necessary information.

OR

- c. If Client wishes to continue the project for another year, Client contacts CT / CM.
- d. CT / CM / SMS CM and Client identify specific areas for improvement.
- e. CT / CM prepares new proposal and submits to Client.
- f. Start again with point 2 above.

We also define the steps to take when faced with the following issues:

1. Technical problem:

there are two possible steps to follow if one is faced with i) a mobile-based issue or a ii) web-based issue. Here, a technical problem refers to a bug with the platform preventing the user from conducting his/her evaluation.

a. For mobile

- I. Upon discovery of the problem, the user contacts Miguel Amador (“Amador”) based in Nicaragua and responsible for SMS Code’s mobile platform, explaining the issue at hand.
- II. Amador evaluates the problem and contacts the user. Based on the issue, a solution is implemented within one day and up to a week.
- III. SMS Local team verified that the problem has been fixed. If so, the evaluation may start anew.

b. For web

- I. Upon discovery of the problem, the user contacts Paula Sanabria (“Sanabria”) based in Cost Rica and responsible for SMS Code’s web platform, explaining the issue at hand.
- II. Sanabria evaluates the problem and contacts the user. Based on the issue a solution is implemented within one day and up to a week.
- III. SMS Local team verified that the problem has been fixed. If so the evaluation may start anew.

2. Notification of cases of non-compliance with critical criteria

- a. If a SMS technician finds a case of non-compliance with critical criteria such as child labor or forced labor or failure to pay minimum wage during a SMS Code evaluation, he/she needs to inform immediately the SMS CM.
- b. SMS CM gets in touch with the relevant farm(s) where the issue was found in order to confirm non-compliance and determine its cause(s).
- c. If the SMS CM confirms the case of non-compliance, he / she must inform the relevant country trader ("CT") as well as the GCC and CSO (see graph in Section 2.1) and ECOM Coffee's Sustainability Director Sue Garnett ("SD").
- d. The SMS CM and CT then inform the relevant client that an issue of non-compliance with critical criteria was found in their value-chain. The SMS CM and CT must Cc the SD and the CSO in all communications with the client.

3. If client wishes to add information initially not included in the project

- a. A client can contact the relevant CT to include additional data even if the SMS Code is already under way.
- b. The CT needs to liaise with the SMS CM to verify whether the information required can be included and if so at what costs.
- c. Upon completing b. the CT informs the client whether it is possible and precise any extra costs.
- d. Additional data may include mapping, production costs analysis, extra social and environmental information, soil analysis, client-specific survey and KPIs.

2.6. SMS Code Grievance mechanism: Claims labelling

SMS Code is an improvement program focused on farmer improvement especially in productivity and quality aspects, through access to technical assistance, agricultural inputs, plant varieties, increased productivity, access to competitive market amongst other.

SMS Code Program have two levels to cover Grievance Mechanism scope: 1) At farm level where SMS agronomists through SMS-4.1.22 evaluate the access and compliances with this topic.

To cover other Stakeholders SMS Global Level created a formal procedure called " ECOM Grievance Mechanism document", where any actor linked to SMS Code Program can access and create a formal complain to ECOM. See ECOM external speak up line / grievance mechanism:

Link: <https://www.ecomtrading.com/media/OjOaktuo/ecom-speak-up-policy-external-september-2024-english.pdf>

2.6.1. Use of SMS Logo.

Clients can use the SMS Code reports and SMS Code logo only and exclusively for internal purposes (sustainability aspects). Currently, the SMS Code Program does not allow clients to use SMS Code logos and branding for end consumer facing products.

2.6.2. Farmer's claims.

Farmer members of SMS Code Program have the opportunity to file a claim in case of non-compliance or verification decision. Farmer need to complete the following process:

- a. Contact the SMS Agronomist.
- b. Prepare the claim (oral or written).
- c. SMS Agronomist will register the claim.
- d. SMS Agronomist will share the claim with SMS Manager or Agronomist in charge Of SMS Code Region.
- e. SMS Manager will analyze the claims and will provide feedback to the farmer in the next five days from the claim was received.
- f. SMS Agronomist or SMS Manager will ask for more details to the farmer in order to have all the information for a decision.
- g. SMS Manager must inform to SMS Global Administrator about the cause and resolution of the claim. SMS Global Administrator can participate on resolution process and can also retain some inputs for Program improvements.
- h. All claims must be documented.

2.6.3. Agronomist claims.

Agronomist also can express a claim or improvement to the Program. SMS Agronomist needs complete the following process:

- a. Contact the SMS Manager
- b. Prepare the claim (oral or written)
- c. SMS Agronomist will share the claim with SMS Manager or Agronomist in charge of SMS Code Region.
- d. SMS Manager will analyze the claims and will provide feedback to the Agronomist in the next five days from the claim was received.
- e. SMS Manager will ask for more details to the farmer in order to have all the information for a decision.
- f. SMS Manager must inform to SMS Global Administrator about the cause and resolution of the claim. SMS Global Administrator can participate on resolution process and also can take some inputs for Program improvements.
- g. All claims must be documented.

2.6.4. Clients and stakeholders claims.

Clients, roaster and stakeholders can express a claim or improvement to the Program. Clients' needs complete the following process:

- a. Contact the SMS Manager or ECOM Trader.
- b. Prepare the claim (written).
- c. SMS Manager or ECOM Trader will share the claim with SMS Global Administrator.
- d. SMS Global Administrator will analyze the claims and will provide feedback to the SMS Manager or ECOM Trader in the next five days from the claim was received.
- e. SMS Global Administrator will ask for more details to the roaster in order to have all the information for a decision.
- f. SMS Global Administrator must inform the roaster about the cause and resolution of the claim.
- g. All claims must be documented.

2.6.5. Grievance Mechanism Policy.

For Grievance Mechanism policy and procedure please access to:

- ECOM Ethical Concerns Policy (Annex IV).
- ECOM SMS Code Grievance Mechanism (Annex VI).
- Grievance Flow Chart (Annex V)

A man with a weathered face, wearing a blue long-sleeved button-down shirt, blue jeans, and a blue bucket hat, stands outdoors. He is holding a thick, weathered wooden staff with both hands in front of him. A brown leather strap is visible around his waist. The background is a blurred natural setting with green foliage and grey rocks.

CHAIN OF CUSTODY

3. Chain of Custody.

SMS Code Program defines the following critical control points linked to Chain of Custody in order to preserve the SMS Code coffee across the supply chain, based key elements such as:

- *Traceability and Transparency*: The entire process, from the farm to the exporter should be transparent, ensuring all involved parties have access to accurate information about the coffee's origin and handling.
- *Sustainability*: The chain of custody process must include consideration of environmental and social factors, ensuring that the coffee is produced in a sustainable manner.
- *Record-Keeping*: Proper documentation at each step of the chain is essential to maintain SMS Code quality and ensure transparency on supply chain.

SMS Code program considers the following critical controls points:

3.1. Coffee farmers:

3.1.1. Role: Responsible for coffee production.

3.1.2. Documentation needed:

- Farm and Farmer GPS Point.
- Farm Polygon (If is more than 4 hectares)
- Harvest estimation.
- Coffee Sales Records (dates, price and quantities)
- Coffee deliveries records.
- Coffee processing records (if applicable)
- Traceability procedure.
- Other documentation to guarantee SMS Code coffee condition.

3.2. Processing (Wet or Dry Mill):

3.2.1. Role: Responsible for coffee processing - wet and dry mill.

3.2.2. Documentation needed:

- SMS Code Farmer list.
- Processing records (wet vs. dry process)
- Volume of SMS Code product purchased.
- Volumen in stock.
- Conversion methods.
- Mass balance (purchase coffee vs. sales) volume sold does not exceed the volume purchased.
- Traceability procedure.
- Product Separation and Identification: SMS Local operates a system which ensures that SMS Code Coffee is not mixed with non-SMS Code coffee product (including during transportation and storage).
- SMS Local enables visible identification of SMS Code Coffee product. This can be done by making references on signs, or with tags/labels on bags/pallets.

3.3. Exporter:

3.3.1. Role: Responsible for handles the logistics of shipping and sales.

3.3.2. Documentation needed:

- Contract sales (quantity of SMS Code product sold)
- Total premium received.
- Totalsales by roaster.
- Invoices and BL.
- Shipment quantity and destination.
- Coffee deliveries records.
- Traceability procedure.
- SMS Code Traceability reports.
- Other documentation to guarantee SMS Code coffee condition.

Important: The SMS Code Program is being implemented in many ECOM origins. Each country is responsible for complying with the Chain of Custody critical control points as the minimum requirement in order to guarantee of SMS Code coffee quality across the supply chain.

It includes their own documentation, systems, procedures and protocols.

A dramatic landscape photograph featuring terraced vineyards in the foreground and middle ground. The terraces are covered in green vines, with reddish-brown soil visible between them. In the background, dark, jagged mountain peaks rise against a heavy, grey, stormy sky. The overall mood is somber and atmospheric.

Auditing

4. Auditing

The SMS Code always involve two auditing processes to guarantee the correct implementation of the program. We discuss the two processes in more details below.

4.1. Internal Country Audit process

4.2. Famer Internal Audit methodology.

As of today, we conduct internal auditing at the farm level to guarantee the integrity and successful implementation of the SMS Code Program. We organize at least one visit per year to 100% of the farms included in a SMS Code program. These visits are conducted by SMS technicians considering the following process:

4.2.1. Pre-audit.

- Define the farms or Group of farms to be evaluated. In this case SMS Manager have to inform to SMS Global Staff.
- SMS Auditors: SMS Global Staff confirm if the agronomist or technician have been completed the SMS Code Training before starting with Internal inspection.

4.2.2. Tools and documentation

- SMS Code content for farmer is the documentation to be evaluated at farmer level.
- SMS Agronomists will evaluate each farmer using SMS Code Module into SMS Integrity application or Excell file.

4.2.3. Sampling.

- All the farmers members of SMS Code project will receive at least one SMS Code Assessment at year conducted by SMS Local Staff.

4.2.4. Field Audit .

- Introduction to the coffee farmer.
- Summary of SMS Code Program.
- Field visit to verify the implementation of the program such as renovation areas, pruning , housing, water bodied, conservation areas and others.
- Documentation to be verified: Coffee receipts , wages payments, social and environmental policies, others payments, contracts, Sales, farm polygon and GPS Location and others.
- Traceability procedures.
- Presentation of audit findings.
- Closing meeting (verbal is accepted by the program)
- Explanation of the next steps, including timelines.

4.2.5. Data synchronization.

- Once SMS Local staff finish 100% of internal Audits have to synchronized information to the SMS Global staff.
- SMS Local Manager and SMS Global staff will confirm if the information synchronized is correct to continue with data analysis.

4.2.6. Data analysis:

- SMS Global staff will analyze all SMS Code assessment and will prepare a report to be discussed with the Local Manager.

4.2.7. Meeting results.

SMS Global will prepare a report according to the audit findings and will be presented on a meeting with the Local Manager.

4.3. SMS Global Country Audit.

Since June 2020, another process is implemented at the administrator level, which aim at enabling SMS Global staff to guarantee the successful implementation of the Code by the SMS CM in a specific origin. The This auditing process involves:

4.3.1. Selection of countries to be audited:

- SMS Global defining at the beginning of each year which two countries will be audited.
- SMS Global will inform to SMS Manager according to countries selection. SMS Global will define estimated month for audit.

4.3.2. Scope:

- This audit will be done bases on the document “SMS CODE Program for Managers” version November 2024.
- This audit will apply to 100% of SMS Code Projects implemented by country. 3.3.3. Auditor: SMS Global staff will lead this audit.

4.3.3. Audit program:

- Auditor's Introduction.
- Introduction of the participants / Information about the structure and changes since the last audit.
- Summary of SMS Code Program transactions since the last audit.
- Confirmation of the audit program.
- Farms visits- at least 2 farms.
- Purchases (suppliers, sourcing plans, invoices, contracts, purchase volumes, price and premium payments).
- Sales (contracts, packaging/label approval, invoices, buyers, volumes, mass balance).
- Traceability.
- Presentation of audit findings.
- Proposal of corrective actions by the client if applicable
- Copies of the closing report and signature by both parties.
- Explanation of the next steps, including timelines.

4.3.4. Audit Report:

SMS Global will prepare a report according to the audit findings, this report includes at least the following information:

- Audit summary.
- SMS Code Score.
- SMS Code Status.
- SMS Code results per fundament.
- Supply Chain Location.
- Supply Chain Traceability.
- Sample details.
- Audit conclusion.
- Audit Findings.
- Annex (If are needed).

4.3.5. Audit report to SMS Country Manager.

- SMS Global Staff will send the report to SMS Manager.
- A meeting will take place to discuss the results and evaluation of SMS Agronomist involved into SMS Code assessments.
- If necessary a work plan will have to be developed.

4.4. External Audit process

To date, the SMS Code welcomes third-party auditing financed by the client. Third-party audit must be done on the basis and according to the criteria of the SMS Code, not client-specific benchmarks and requirements.

Once the external audit is set up with the Client, it is the GCC's responsibility to support and train the staff assigned by the Client (see Section 6). Sample for external audit process is defined by square root of total farm involve on SMS Code Program. Report template and scope is responsibility of the roaster and the external body contracted. This process will be implemented below following methodology:

4.4.1. Pre-External audit.

- Roaster or client have to inform to SMS Manager or SMS Global Staff about the external audit necessity.
- SMS Global Staff and SMS Manager will define the estimated month for external audit process. Month and date have to be confirmed by Roaster/ client.

4.4.2. External certification body selected.

- Roaster or client will select the external body for external audit process. If the roaster or client does not have any external body SMS Local Manager will propose at least two options of certification companies. Roaster is responsible to select the certification company.
- External body will accept month and audit scope.
- If is need SMS Global Staff can explain scope of SMS Code Program to external certification body in order to be align with the objectives and final products.

4.4.3. SMS Code training to External body members:

- SMS Global Staff will provide a training about the SMS Code Program to the staff selected by the external body to be part of the external audit.
- This training will include: documentation, rules, scope and sampling.
- SMS Code Program considers exceptions or clarifications about the content and implementation of certain criteria. Those exceptions have to be considered as official for external audit process. Official document must be share with the external body before starting auditing process.

4.4.4. Sampling

- Sampling farmers is defined by square root of total farm involve on SMS Code Program related to the client.

4.4.5. Audit Program

Audit program will be executed according to the external body parameters, the minimum scope is defined by:

- Auditor's Introduction.
- Introduction of the participants / Information.
- Confirmation of the audit program.
- Farms visits according the sampling.
- Purchases (suppliers, sourcing plans, invoices, contracts, purchase volumes).
- Sales (contracts, approval, invoices, buyers, volumes).
- Traceability.
- Presentation of audit findings.
- Printing of two copies of the closing report and signature by both parties.
- Explanation of the next steps, including timelines.

4.4.6. Audit Report

Client is responsible of the audit report scope . SMS Global staff will recommend the following report scope:

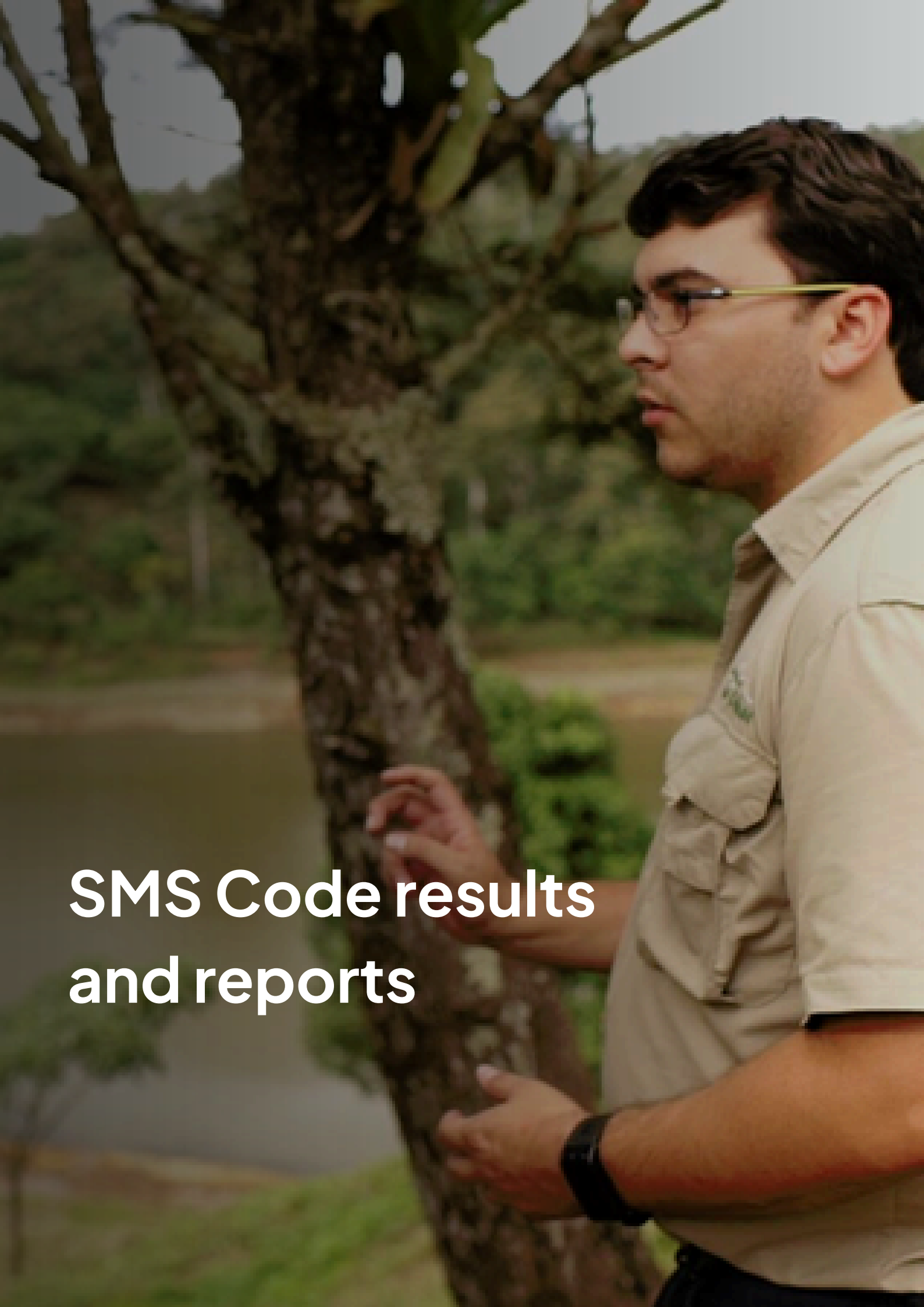
- Audit summary.
- SMS Code Score.
- SMS Code Status.
- SMS Code results per fundament.
- Supply Chain Location.
- Supply Chain Traceability.
- Sample details.
- Audit conclusion.
- Audit Findings.
- Annex (If are needed).

4.4.7. Audit Report approval.

- External body selected will share the report to SMS Global and SMS Manager for approval or comments.

4.4.8. Report communication.

SMS Global Staff / SMS Local Manager will share the final report to the Roster for approval or comments.

A man with dark hair and glasses, wearing a light-colored khaki shirt, is shown in profile from the chest up. He is looking towards the left. His hands are positioned near a tree trunk, with his fingers slightly curled. He is wearing a black wristband on his left wrist. The background is a blurred outdoor setting with green foliage and a body of water.

SMS Code results and reports

5. SMS Code results and reports

5.1. SMS Code results

Following the implementation of the SMS Code and field visit, SMS puts together an annual consolidated report presenting the results/findings. The results are generated from SMS Integrity and can be accessed by the client depending on the contract and the origin. We note that although the report is prepared annually, the actual date of release depends on each origin.

The results put forward in this report are used by both SMS and the client to determine specific topics/areas to improve at farm-level the following year. The results are also used to set the budget for the upcoming year. The results help SMS staff and the client track the performance of farms included in a SMS Code program throughout the years.

In case the client decides not to renew the program, they may use the report for its own reporting / use.

The Local SMS team shall coordinate with the customer and the Global SMS team the presentation of the annual results. Each origin establishes the appropriate time for the presentation of the results.

In addition, Local SMS teams should share the results with the producers that are members of the program. The goal is for each member producer to know the areas evaluated, their performance and areas of improvement for the next cycle. In parallel, the SMS team should consult the producer for feedback on the program, areas evaluated, possible improvements and new topics that it would like to include for future periods.

5.2. Results verification and approval

Prior to generating the annual report, SMS verifies the integrity of the data and approves it before sharing it with the client. This process involves both SMS at local and global levels.

5.2.1. Local SMS Team

- Perform SMS Code evaluations to 100% of the program's member producers.
- Check that all SMS Code assessments are 100% complete.
- Verify that all farms have been evaluated. If a producer has more than one farm in the program, an independent evaluation must be available for each farm.
- Approve the quality of the information in each SMS Code evaluation.
- Inform the Global SMS team that the information is uploaded and approved in the SMS Integrity.

Once the report has been generated in the SMS Integrity system the Local SMS team will need to coordinate with the client the presentation of the results through an annual meeting.

5.2.2. Global SMS Team

- Coordinate SMS Code assessments with Local SMS teams by using the SMS Integrity tool.
- Support in the creation of the annual SMS Code report.
- Share access so that Local SMS can view the results of SMS Code assessments.
- Support the presentation of SMS Code results with local SMS teams and customers.
- Incorporate any changes that are requested by the customer or the Global SMS team.

5.2.3. Remediation in case of identification of non-Conformities.

- In the case of identification of farms with non-compliance with Core Criteria such as Child labor, Forced Labor, Minimum Wage, working hours, discrimination or access to education, those farms are out of SMS Code Program, and coffee from those farms cannot be sold as SMS Verified.
- In the case of identification of farms with non-compliance with Basic Criteria (not core) such improvements in agrochemical warehouse, suppliers, internal inspections, trainings or farmer commitment, those farms will be on Provisional Status (One year). For tracking of improvements SMS Agronomist/ technicians will create into SMS Integrity SMS Visit and SMS Action plan. After one-year farms in Provisional status must comply with 100% of applicable Basic Criteria.
- In the case of identification of farms with non-compliance with Driver Criteria such renovation, pruning, climate change, use of new coffee varieties, soil analysis and fertilization plan SMS Agronomist/ technicians will create into SMS Integrity SMS Visit and SMS Action plans in order to track implementation of those practices in short, medium and long term but farmers don't have any specific year for comply with these practices.

5.3. SMS Code – analysis and use of results

5.3.1. Analysis of results

Once SMS Global has generated the report, the client and the local SMS team organise a meeting to review and discuss the findings and improvements for coming year or cycle.

5.3.2. Use of results

Below we provide a non-exhaustive list:

- Definition of areas to improve.
- Elaboration of budget
- Development and definition of KPIs for the client

5.4. SMS Code report

The report is structured in the following way:

5.4.1. SMS Code report- country level

- Local SMS teams will be able to see the results of SMS Code projects on the SMSi Global platform.
- Access to the SMSi Global will be forwarded to the SMS Country Manager for their respective review and analysis of results.
- Likewise, the Local SMS team must present the results individually to each producer to report the performance of their farm in the program, including corrective actions per farm and farmer. Action plans need to be created in SMSi.
- If farmers have any comment or doubts related with SMS Code results, they can contact SMS local team, which must explain finding and actions plans. SMS Local team must demonstrate tracking of complaints and suggestions with farmers – Use of SMSi.
- See Annex I- SMS Code report model in SMSi Global

5.4.2. SMS Code report – client’s level

- According to the negotiation between Local SMS – SMS Commercial Department with the client, the client may have two ways to access the results of the SMS Code project: 1) Access to SMSi Global (See Annex I) and 2) PDF document with project summary information.
- The client must access the SMSi Global platform to view the results of the project. The local SMS team must coordinate with the Global SMS Team the creation of user and password to access the SMSi system.
- Once the access to the SMSi system is created, the Global SMS team will inform the Local SMS team for a presentation of the results with the client.
- If the customer does not have access to the SMSi System, the local SMS team must coordinate with the SMS Global team the elaboration of a PDF document.
- SMS Code Program includes two basic reports:
 - a. SMS Code Annual Report: It includes details of SMS Code evaluation, score per fundament, score per farmer, improvement areas and extra information as photos, trainings, others.
 - b. SMS Origin Report: Its report is shared to the client when a project is starting, this report includes region where coffee is coming from, list of farmers and annual plan.
- Annex II- presents the SMS Code reporting model in PDF format.

SMS Code training implementation for SMS Origins

5.5. Scope of the training

The training of the SMS Code Program is key to ensure proper implementation by local SMS teams. This training is developed in person or virtually with the technicians responsible for the implementation of the code at the administrative and field level. Training is provided by the SMS Global team.

The goal of SMS Code training is to:

- **Presentation SMS Code Content:**

Present the current version of SMS Code to the Local SMS Team. This session includes the following topics:

a) SMS Code Criteria content – Office session:

Explanation of each criterion to SMS Local Team and clarify doubt or questions (attached example of Agenda for SMS Code Training in Ethiopia).

b) SMS Code and SMS Integrity – Office session:

Presentation of SMS Code Module into SMS Integrity- how to collect SMS Code data on the field using SMS Integrity mobile app.

c) SMS Code farm visit– Field session:

Practice for SMS Code assessment. SMS Team collect SMS Code data and use of SMS Integrity mobile app.

d) SMS Code Feedback –Office session:

Receive feedback about the use of the System and SMS Code for SMS Local Team. In this session SMS Global Staff and SMS Local Team could define scope of certain SMS Code criteria. For example, depending on farm size of some criteria related to contracting of labor hand can apply or not

- **Quality control procedures**

The procedures for the implementation of the SMS Code based on the SOP SMS Code May 2020 document are also established. Session focused to SMS Managers.

- **Staff accreditation process / testing**

The training last one week. At the end of the training, the Global SMS team certifies which members of the local SMS team are eligible for the implementation of the SMS Code in their origin. This information is communicated to the SMS Manager in the origin

On an annual basis, the SMS Global team will coordinate with the Local SMS teams the relevance of a refresh of the contents and concepts developed in the SMS Code program. Local SMS Team informs the need for training to the Global SMS team, and from there the place and dates for training are coordinated.

5.6. Steps to implement SMS Code

The SMS Code training has different steps, as follows:

1. Project definition and member producers:

The Local SMS team must define the list of producers that are members of the program. This selection is based on criteria such as: farm size, agronomic management, height, variety, among other parameters.

2. Using the SMS Integrity (SMSi)

SMSi is the base tool for the implementation of the SMS Code, therefore its correct use is key to the generation of positive results in the Program. For this reason, the focus is on the use of the platform and its relationship with the program.

The following diagram shows the flow of information that is collected with SMSi and its relationship to the SMS Code.



5.7. Field training

SMS Staff needs to receive SMS Code training with the following objectives:

a) SMS Code Criteria content – Office session:

Explanation of each criterion to SMS Local Team and clarify doubt or questions (attached example of Agenda for SMS Code Training in Ethiopia).

b) SMS Code and SMS Integrity – Office session:

Presentation of SMS Code Module into SMS Integrity- how to collect SMS Code data on the field using SMS Integrity mobile app.

c) SMS Code farm visit– Field session:

Practice for SMS Code assessment. SMS Team collect SMS Code data and use of SMS Integrity mobile app.

d) SMS Code Feedback –Office session:

Receive feedback about the use of the System and SMS Code for SMS Local Team. In this session SMS Global Staff and SMS Local Team could define scope of certain SMS Code criteria. For example, depending on farm size of some criteria related to contracting of labor hand can apply or not.

A landscape photograph showing terraced vineyards in a valley. The foreground is a dark, textured field. The middle ground features several rows of terraced vineyards with green vines, separated by reddish-brown soil. In the background, there are dark, silhouetted mountains under a cloudy, overcast sky.

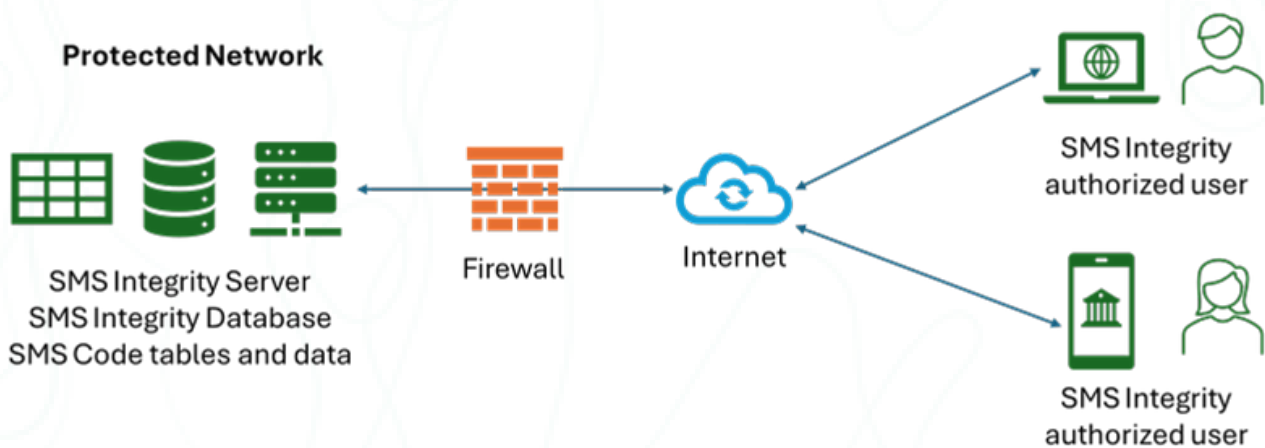
Data Management – SMS Integrity

6. SMS Code data management into SMS Integrity.

SMS Code data structure and controls:

- SMS Code assessments are stored in a Structured Database managed by the application SMS Integrity.
- The access to the SMS Integrity Functionalities is limited to specific users and roles.
- SMS Integrity users must access to the Web or Mobile application with valid credentials; only authorized users are granted to access to the SMS Integrity application.
- The SMS Integrity database is hosted in servers located in an insulated network which prevents unauthorized access.
- Through SMS Integrity platform SMS Global Staff and SMS Local staff have access to SMS Code Projects, SMS Code Surveys, SMS Code assessments and SMS Code results. Additionally, on this platform Local teams can create SMS visits and recommendations.

SMS Integrity access diagram





Annex III: Banned agrochemical list

7. Annex III: Banned agrochemical list

7.1. Prohibited pesticides list

SMS Code Program defined the list of prohibited pesticides according to Coffee Sustainability Reference Code- Annex Pesticide List Reference Code - Annex Pesticide:

https://www.globalcoffeeplatform.org/wp-content/uploads/2023/08/CSRC21_ANNEX-PESTICIDES-LIST_2023.pdf

7.2. Use of pesticides in the Phase-out List

SMS Code Program defined the use of pesticides in the Phase-out List are reduced through use of Integrated Pest Management and phased out by 2030, if feasible. This includes pesticides that are classified by national and international regulatory agencies

https://www.globalcoffeeplatform.org/wp-content/uploads/2023/08/CSRC21_ANNEX-PESTICIDES-LIST_2023.pdf

A photograph of a dense forest with tall, slender trees and a thick canopy of green leaves. Sunlight filters through the foliage, creating a dappled light effect. The text "Annex IV: Grievance Mechanism" is overlaid in white, bold font on the lower left side of the image.

Annex IV: Grievance Mechanism



HR GRIEVANCE POLICY

*This document is owned by Group HR
Last updated December 2023*

1. INTRODUCTION

- 1.1 ECOM Agroindustrial Corp. Limited ("**ECOM**") and the companies within its group (together the "**ECOM Group**", "**we**", "**our**" or "**us**") considers it important that all employees have access to a procedure to help deal with any grievances relating to their employment fairly and without unreasonable delay. We aim to investigate any formal grievance you raise, hold a meeting to discuss it with you, inform you in writing of the outcome, and give you a right of appeal if you are not satisfied.
- 1.2 The purpose of this procedure is to set out how employees can raise an HR or employment related grievance and how we will investigate and deal with such grievances. Any grievances relating to illegality or any other form of misconduct should be dealt with in accordance with ECOM's Internal Speak Up Policy or ECOM's External Speak Up Policy, as appropriate.
- 1.3 The ECOM Group hopes that its personnel will feel able to voice any concerns openly. However, all reports made under this Policy will be treated confidentially and we will make every effort to keep your identity and the identity of any persons assisting you in your report, secret.
- 1.4 Under this policy, it is possible to raise concerns informally, formally or anonymously. To this end, ECOM has contracted with Speak Up to provide a secure, anonymous reporting platform (please see details at paragraph 6 below) through which it is possible to raise grievances.
- 1.5 If reports are made through any other mechanism, or if you choose to identify yourself as part of your report, we will seek your consent if we consider that disclosure of your identity may be necessary for the purposes of any investigation.
- 1.6 It is the ECOM Group's intent that users of this Policy be acknowledged and taken seriously, and that full records are maintained when issues are escalated and investigated pursuant to this Policy. This Policy also confirms that retaliation will not be tolerated against anyone that raises a concern under this Policy in good faith.
- 1.7 The ECOM Group recognizes, however, that false accusations of harassment or other unlawful behaviour can be detrimental to an accused employee and disruptive to the ECOM Group's operations. Thus, knowingly-made false accusations may constitute misconduct for which disciplinary action, up to and including termination of employment, may be imposed. The ECOM Group will abide by all local laws and regulations in regards to employment discipline.
- 1.8 This Policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

2. SCOPE

- 2.1 This Policy is for use by all employees, officers, workers, consultants, contractors, volunteers, interns, job applicants, casual workers and agency workers and may be amended at any time.
- 2.2 Issues that could cause grievances may include:

HR GRIEVANCE POLICY

- 2.2.1 terms and conditions of employment;
 - 2.2.2 danger to health and safety, including matters concerning food safety and product safety;
 - 2.2.3 work relations;
 - 2.2.4 bullying and harassment;
 - 2.2.5 new working practices;
 - 2.2.6 working environment;
 - 2.2.7 organisational change; and
 - 2.2.8 discrimination.
- 2.3 Where a grievance relates to discrimination, harassment, or victimisation, you may use the procedure outlined in this Policy to raise a complaint. This applies whether you have personally experienced such behaviour, or you have witnessed this happening to someone else.
- 2.4 We recommend familiarising yourself with our Equal Employment Opportunity, Non-Discrimination and Non-Harassment Policy which sets out the ECOM Group's commitment to equal opportunities, fair treatment and a hostility-free work environment, providing an overview of our position on these issues.
- We operate a separate Internal Speak Up Policy to enable employees to report illegal activities, wrongdoing or malpractice. However, where you are directly affected by the matter in question, or where you feel you have been victimised for an act of whistleblowing, you may raise the matter under this Policy.
- 3. USING THIS PROCEDURE**
- 3.1 It is possible to raise any grievances under this Policy in three ways: informally, formally or anonymously through our reporting platform. Before raising any grievance, you should read through the entirety of this Policy so you are aware of all options open to you.
- 3.2 If you have difficulty at any stage of the grievance process because of a disability or for any other reason, you should discuss the situation with your line manager or local HR representative as soon as possible.
- 3.3 Where you have chosen to identify yourself when making a report under this Policy, grievances may be placed on your personnel file along with a record of any decisions taken and any notes or other documents compiled during the grievance process. We may create a transcript or written record of any reports made orally or during a meeting. Should this be the case, you will be given the opportunity to check and agree such a transcript or written record. Reports will be stored for no longer than is necessary and in compliance with our data protection obligations.



HR GRIEVANCE POLICY

4. RAISING GRIEVANCES INFORMALLY

Most grievances can be resolved quickly and informally through discussion with your line manager or your local HR representative. If you feel unable to speak to your line manager because the complaint concerns them, then you should speak informally to your local HR representative or regional HR Manager. If this does not resolve the issue, you should follow the formal procedure below.

5. RAISING GRIEVANCES FORMALLY

- 5.1 If your grievance cannot be resolved informally, you should put it in writing and submit it to your line manager or your local and/or regional HR representative, indicating that it is a formal grievance. If the grievance concerns your line manager, you should submit it to your local and/or regional HR representative.
- 5.2 The written grievance should contain a brief description of the nature of your complaint, including any relevant facts, dates, and names of individuals involved. In some situations, we may ask you to provide further information.

6. RAISING GRIEVANCES ANONYMOUSLY

- 6.1 The ECOM Group has partnered with SpeakUp to provide a secure, anonymous platform through which it is possible to raise any grievances both formally and anonymously (the “Platform”). Reports can be made on the Platform via an app, website or by phone. Contact details and access points to the Platform can be found in Annex A of this Policy.
- 6.2 The Platform allows you to provide information regarding the nature of your complaint, including any relevant facts, dates, locations, and names of individuals involved (including those of any witnesses who could provide supportive or related information). You are free to provide as little or as much information as you like in relation to your grievance. However, we note that the more information you provide, the more likely we are able to address your grievance effectively.
- 6.3 The Platform is completely anonymous and we will never ask for your name, or any other information which may serve to identify you, through the platform. However, you are free to identify yourself should you wish to do so. We note that opting to remain anonymous may make it more difficult or impossible for us to investigate your claim and to establish whether any allegations are credible if we cannot obtain further information from you. Consequently, if you opt to remain anonymous, it is important to provide as much information as possible in your report to allow a meaningful investigation.
- 6.4 All reports made via the Platform will follow an internal triage process so that your grievance can be handled by the appropriate persons. Grievances raised in accordance with this Policy will be handled by either your local HR representative or the Global HR Director, who will act as ECOM’s Grievance Officer. Contact details for ECOM’s Grievance Officer can be found in Annex B of this Policy.

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6.5 We aim to respond in the first instance to all grievances made through the Platform within seven days of such report being made.

6.6 Where grievances are raised through the Platform, a record of the grievance, decisions made, any notes or other documents compiled during the grievance process will be retained on the Platform and stored in compliance with our data protection obligations.

7. EXTERNAL DISCLOSURES

7.1 The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying concerns in the workplace. ECOM strongly believes that this mechanism represents the best way to report concerns and, in most cases, you should not find it necessary to alert any external parties.

7.2 There may be some legally recognised circumstances where it may be appropriate for you to report your concerns to an external body, such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. A list of external reporting channels is available from the Global Human Resources Director (catherine.henzelin@ecomtrading.com).

8. INVESTIGATIONS

8.1 It may be necessary for us to carry out an investigation into your grievance. The amount of any investigation required will depend on the nature of the allegations and will vary from case to case. It may involve interviewing and taking statements from you and any witnesses, and/or reviewing relevant documents.

8.2 You must co-operate fully and promptly in any investigation. This may include informing us of the names of any relevant witnesses, disclosing any relevant documents to us and attending interviews, as part of our investigation.

8.3 We may initiate an investigation before holding a grievance meeting where we consider this appropriate. In other cases we may hold a grievance meeting (provided you have identified yourself) before deciding what investigation (if any) to carry out. In those cases, we will hold a further grievance meeting with you after our investigation and before we reach a decision.

8.4 The individual investigating the allegations may consult legal counsel, if required and will make a determination of the proposed resolution which is transmitted to the complainant. The ECOM Group will abide by any applicable local laws and regulations regarding tribunals for complaint procedures.

9. RIGHT TO BE ACCOMPANIED

9.1 Unless otherwise stated by local laws and regulations, you may bring a companion to any grievance meeting or appeal meeting under this procedure. The companion may be a colleague. You must tell the person holding the grievance meeting who your chosen companion is in good time before the meeting.

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- 9.2 At the meeting, your companion may make representations to us and ask questions, but should not answer questions on your behalf. You may talk privately with them at any time during the meeting.
- 9.3 Acting as a companion is voluntary and your colleagues are under no obligation to do so. If they agree to do so they will be allowed reasonable time off from duties without loss of pay to act as a companion.
- 9.4 If your chosen companion is unavailable at the time a meeting is scheduled and will not be available for more than five working days afterwards, we may ask you to choose someone else.
- 9.5 We may, at our discretion, allow you to bring a companion who is not a colleague (for example, a member of your family) if this will help overcome a disability or any other impediment to the grievance process.

10. GRIEVANCE MEETINGS

- 10.1 Provided you have chosen to identify yourself when raising your grievance, we will arrange a grievance meeting as soon as possible after receiving your written grievance.
- 10.2 You and your companion (if any) should make every effort to attend grievance meetings. If you or your companion cannot attend at the time specified, you should inform us immediately and we will try, within reason, to agree an alternative time.
- 10.3 The purpose of a grievance meeting is to enable you to explain your grievance and how you think it should be resolved, and to assist us to reach a decision based on the available evidence and the representations you have made.
- 10.4 After an initial grievance meeting we may carry out further investigations and hold further grievance meetings as we consider appropriate. Such meetings will be arranged without unreasonable delay.
- 10.5 We will write to you, usually within five business days of the final grievance meeting, after any investigation has taken place, to inform you of the outcome of your grievance and any further action that we intend to take to resolve the grievance. We will also remind you of your right of appeal. Where appropriate we may hold a meeting to give you this information in person. In some circumstances, including if you have raised your concern anonymously, we may not be able to share all details with you if this would prejudice any investigation or affect the rights of others.

11. APPEALS

- 11.1 If the grievance has not been resolved to your satisfaction you may appeal in writing to your local HR representative, stating your full grounds of appeal, within five business days of the date on which the decision was sent or given to you.
- 11.2 We will hold an appeal meeting, normally within five working days of receiving your written appeal. Where practicable, the appeal hearing will be conducted by a Grievance Officer who has not been previously involved in the case and is senior to the individual who conducted the previous meeting. They may ask anyone previously involved to be present. You have the right to bring a colleague to the meeting (see paragraph 9).

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- 11.3 We will confirm our final decision in writing, usually within five business days of the appeal hearing. This is the end of the procedure and there is no further appeal.
- 11.4 Nothing in this policy shall serve to restrict any right available to any reporter pursuant to local law or regulation.
- 12. PROTECTION AND SUPPORT**
- 12.1 We aim to encourage openness and will support stakeholders who raise genuine concerns under this Policy, even if they turn out to be mistaken, and such reports will not affect the employer-employee relationship.
- 12.2 ECOM personnel and those who assist or support them (in a work-related context) in making a report under this Policy (or under our Internal Speak Up Policy) must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes, but is not limited to, dismissal or termination of services, demotion, transfer of duties, disciplinary action, financial loss or penalties, victimisation, harassment, negative references, reputational damage (including via social media), threats or other unfavourable treatment connected with raising a concern, whether occurring directly or indirectly. If you believe that you have suffered any such detrimental treatment, you should inform the Global Human Resources Director (catherine.henzelin@ecomtrading.com) immediately.
- 12.3 If you are involved in threatening or retaliating against reporters or those who assist or support them, you may incur personal liability under the law and also be subject to disciplinary action, up to and including termination of employment.



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ANNEX A: SPEAKUP CONTACT DETAILS AND ACCESS POINTS

Web: using the QR Code or at <https://ecom.speakup.report/en-GB/ecom/home>

App: can be downloaded from the Google Play and iOS App store by searching 'SpeakUp People Intouch'. You will need the company code 109897 or the QR code to make a report



Phone: by using the relevant local phone number below, quoting company code 109897

COUNTRY	LOCAL PHONE NUMBER
Australia	0061282846262
Belgium	080089326
Bermuda	18334222008
Brazil	00551147008838
British Virgin Islands	18334621356
Burkina Faso	0022625300982
Cameroon	00237657103112
Canada	0015143950496
Cayman Islands	0013457695580
China	108001523042 (via China Telecom) 108008522221 (via China United Network) 4001201842 (Country-wide)
Colombia	002250566770918
Costa Rica	002250566770918
Cote d'Ivoire	002250566770918
Ecuador	1800001432
El Salvador	0050322304752
Germany	08001818952
Ghana	00233596993553
Guatemala	0050223028459
Honduras	80027916139
India	0008000503159
Indonesia	00622180630074
Italy	800147694
Japan	0081366270734
Kenya	00254207650957
Korea	0082237005146
Mexico	00525547806198
Netherlands	0031107007503



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COUNTRY	LOCAL PHONE NUMBER
Nicaragua	0050575137610
Nigeria	07080601221
Papua New Guinea	000861322
Paraguay	0098004410266
Peru	080074535
Singapore	006564037051
Switzerland	0800005691
Tanzania	0800111020
Uganda	00256414238162
United Arab Emirates	80004440408
United Kingdom	08000224118
USA	0016692887154
Uruguay	000415985762
Vietnam	008419003271



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ANNEX B: GROUP GRIEVANCE OFFICER INFORMATION

Global HR Director

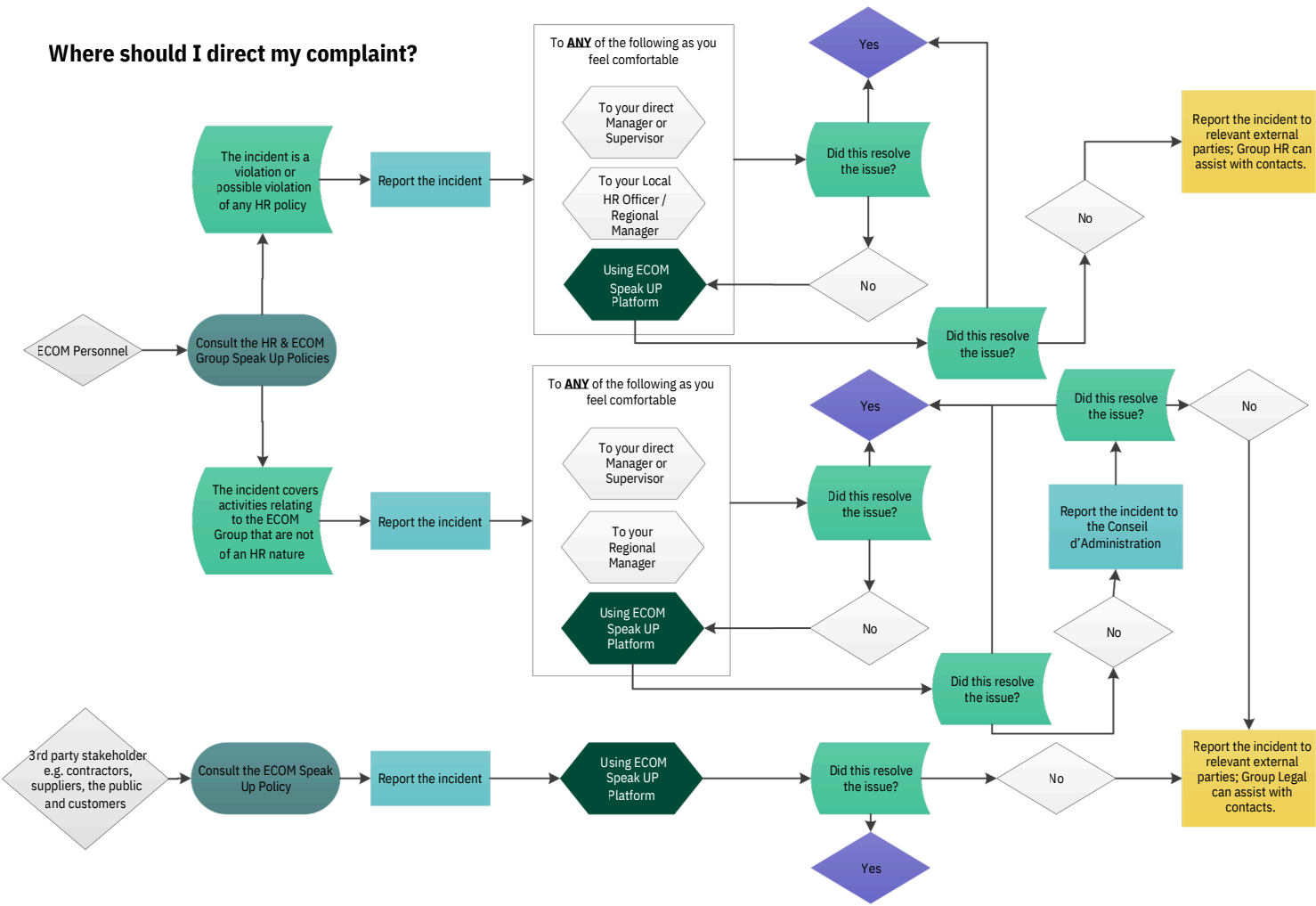
Catherine Henzelin

Tel: +41 58 721 73 37

Email: catherine.henzelin@ecomtrading.com

Annex V: Grievance Flow Chart

Where should I direct my complaint?



9. Annex VI: Grievance Mechanism

Grievance mechanism guideline

Purpose

The following document serves as a guideline for the Management Committee in the application of ECOM's SMS Code Grievance Mechanism within our supply chain. It underlines the importance of having a functioning grievance mechanism and details the processes that must be followed when it is used.

1. Introduction

Our grievance mechanism is designed in a way that any people or organizations affected by our activities may voice their concerns on issues they may encounter. While an emphasis is put on making this mechanism easily accessible to the most vulnerable actors in our supply chain (namely, the workers/farmers), other stakeholders such as community members, unions, NGOs, businesses, or buyers have access to it.

Efficient complaints resolution drives continuous improvement for our grievance mechanism and contributes to increasing fairness and stability within our supply chain.

2. Grievance mechanism processes

The content below details the application and processes of ECOM's SMS Code Grievance Mechanism.

2.1. Accessing the mechanism

For our grievance mechanism to be effective, it must be easily accessible and understandable by all stakeholders. We respond to the previous imperatives as such:

- Farmers must be made aware of the existence of such mechanism. To ensure this principle, farm owners must display a document on their bulletin board (SMS-4.3.3) with information related to the possibility for anyone to fill up a grievance and the different ways to convey their complaint(s) (phone number, email...). Moreover, copies of the ECOM SMS Code Grievance Form in the local language must be available at the farm to all farmers. SMS technicians should make sure that such information is present at the farm and assist workers in case there is any doubt on the functioning of the grievance mechanism
- ECOM members and External stakeholders can access information on the grievance mechanism on our website under the “document & policies” section (<https://www.ecomtrading.com/about-us/ethics-and-compliance/>) or by contacting either an SMS technician, the local SMS manager, or the global SMS manager. External stakeholders can also reach out to the SMS team by sending an email to: ... (SMS Code general e-mail to be created). This email is checked a minimum of twice a week.

2.2. Making and submitting a complaint

Stakeholders have several ways available to submit a complaint. We consider their personal capacity, social background, education, and geographic situation to determine the best possible way of elaborating one.

Farmers have several choices to submit a complaint:

- They can fill the ECOM SMS Grievance Form made available at the farm and hand it over to a SMS technician.
- They can send an email, text message or audio message to a SMS technician to report the complaint.
- They can orally report the issue when a SMS technician is visiting the farm.

Farmers can also communicate their complaint through their union, worker organization, local council, traditional leader, and religious groups that are assuming the responsibility of addressing and resolving grievances.

In all cases, the SMS technician is responsible for collecting the complaints and communicating its content to the local SMS manager.

ECOM members and External stakeholders may:

- Fill the online ECOM SMS Grievance Form made available on our website under the “document & policies” section:
(<https://www.ecomtrading.com/about-us/ethics-and-compliance/>).
- Address a formal email to the SMS Code general email or the local SMS Manager with complete information on the complaints (description of the incident/claim, date and location, organizations or persons concerned...)
- The complaint is admissible if it meets the two following conditions:
 - It is made by any person or organization that encountered an issue with ECOM and/or their subcontractors and service providers.
 - The complaint is based on a situation where the stakeholder has been/is being negatively affected by the actions, rules, or policies of ECOM, or the ones of its subcontractors and service providers.

Furthermore, ECOM’s SMS Code Grievance mechanism ensure that a complainant identity remain confidential.

2.3. Investigating the complaint

Once the complaint is collected and judged admissible (admissibility determined within 1-2 days of receiving a complaint), the investigation process may start. The local SMS Grievance committee is responsible for establishing the investigating mechanism, resolving, and documenting complaints. The committee is composed of a minimum of 2 management members (respecting gender parity if possible) which must be impartial, gender sensitive and respect the principle of confidentiality.

Upon receiving the complaint, the complainant is notified that their demand is being treated. The Committee must now:

- Assess the severity and urgency of the complaint and act accordingly.
- Send a SMS technician on site to gather information and potentially witness the issue mentioned by the compliant.
- Create a dialog between the committee or the SMS technician and the complainant for further details.
- Collect any other information or contact any entity that would help the resolution of the complaint.

If it is discovered that the case contains human right violations (for instance child labor, forced labor, discrimination, workplace violence and harassment), immediate measures of safeguarding must be put in place to protect the complainant or the victims mentioned in the complaint, and relevant authorities may be contacted if appropriate.

When the investigation is complete, the committee shares the results with the complainant, discuss the findings and collaboratively identify the potential solutions so that the remediation protocol may start.

2.4. Resolving the complaint

The local SMS Grievance committee establish an adequate remediation plan based on the information collected, in collaboration with the relevant experts. The entire process should be completed within 12 weeks of the original complaint but may last up to 52 weeks depending on the severity or complexity of the situation. The plan includes both corrections and corrective actions, addressing the root of the issue and preventing similar grievances from being repeated.

The persons or organizations accountable for each correction and corrective action must be clearly defined.

The local SMS Grievance committee holds weekly meetings with the persons or organizations targeted by the remediation protocol to oversee progress in implementation and to assess the effectiveness of the measures agreed upon. If the issue originated from the farm, the SMS technician monitors the implementation and respect of the protocol and report to the local SMS Grievance committee on a regular basis. The process must be documented and must include a timeline for each action that has been completed.

Throughout the process, the committee keeps the complainant regularly informed about the progress of the remediation plan. When the process is complete, the committee checks the complainant satisfaction with the outcome and explains to all relevant stakeholders how the complaint has helped the business to improve. The committee makes sure that all the parties involved understood the original issue, resolution protocol and remedy, and learn from this experience so that such event does not occur again.

If the complainant disagrees with the local committee's findings or is not satisfied by the complaint resolution, they may appeal the decision for a second evaluation until a common ground is found. If accepted, the appeal and all relevant documentation is forwarded from the local committee to the Global SMS Grievance committee who are in charge of reviewing and adjusting the remediation process until a resolution satisfactory to all parties is found.

2.5. Continuous improvement

To ensure continuous improvement of the SMS Code Grievance mechanism and management on-site, the committee evaluates the resolution process. They assess whether the procedure was followed, check the steps taken to protect confidentiality, collect feedback from the complainant and other affected parties and evaluate how the process can be improved for future cases.

All complaint cases must be documented and archived so that an analysis at a larger scale can be done for further improvement of the SMS Grievance mechanism. Furthermore, data from past cases can be used to implement remediation protocols in other contexts, which may accelerate future resolutions and enhance the effectiveness of the mechanism. Generalized information leads to the creation of recommendations and indicators to better grasp the details and complexity of a complaint.

Annex A: ECOM SMS Grievance Form

General information

Organization:

Name (optional):

Surname (optional):

Gender (optional):

Nationality (optional):

Profession:

Workplace:

Phone number:

E-mail:

Complaint severity test

Are you or any other persons concerned by the complaint in a life-threatening situation?
(YES/NO)

Can the situation have long lasting negative impacts on your welfare or the one of the persons concerned (physical, psychological damage...)? (YES/NO)

Are there multiple cases of this issue on site? (YES/NO)

Has the case already been reported in the past? (YES/NO)

Complaint description

Please provide a description of the case, including a time reference, location(s), person or organization responsible for the issue, and all other details that are relevant to you

10. Annex VI: Chain of Custody.

SMS Code Program defines the following policy and critical control points linked to Chain of Custody in order to preserve the SMS Code coffee across the supply chain.

Objective

Implement a system that ensures that SMS Code coffee is not mixed with Conventional coffee at any point in the coffee traceability process, from the farms to the storage and dispatch from the processing facility.

Responsible

SMS Global Staff, SMS Local Manager and ECOM Local operation are responsible for designing, implementing, and overseeing the entire chain of custody system.

Chain of Custody Policy

SMS Global Staff, SMS Local Manager and ECOM Local operations are committed to establishing and maintaining a Chain of Custody policy through the following actions:

- Communicate this Chain of Custody policy to the relevant stakeholders.
- Maintain the physical integrity of the fruit, wet parchment, dry parchment or green bean coffee is preventing the mixing of SMS Code Coffee coffee with conventional coffee or coffee of other qualities, from the moment the fruit is harvested and leaves the farm, until it is processed and stored as parchment coffee at the processing plant.
- Promote the rational use of water resources in the wet processing process, as well as in the cleaning and maintenance of processing equipment.
- Provide training to producers and personnel responsible for receiving, transporting, and processing the coffee, regarding the proper traceability procedures and safeguarding the product's chain of custody.
- Records related to the chain of custody will be archived for at two years.

SMS Global Staff, SMS Local Manager and ECOM Local operations will be responsible for ensuring that the commitments described above are met.

Check list – Critical Controls points

Control point	Management System	Type of Risk	Comply	Comments
Control System: Basic documentation			Yes/ No	
1	SMS Local operation has a flowchart of the SMS Code Coffee product originating from SMS farms with the identification of all processing steps and points where the products from non-SMS Code Coffee.			
2	SMS Local operation has a procedures and records for controlling the reception, processing, mixing, storing, packaging, delivery, transport and sale of SMS Code Coffee from SMS Farmers.	Mixing SMS Code coffee vs. No SMS Code Coffee		
3	SMS Local operation has an updated list of SMS Code farmer and farms. It includes GPS Points, farm polygon (farm with more than 4 hectares).	Mixing SMS Code coffee vs. No SMS Code Coffee		
4	SMS Local operation has a harvest estimation per farmer in order to know the estimation of SMS Code volumen.			
5	SMS Local operation defines on a formal document the responsibilities of the personnel involved with the Chain of Custody for SMS Code Coffee.	Contamination and mixing SMS Code coffee vs. No SMS Code Coffe		
6	SMS Local operation guarantee that the personnel involved with the handling and processing of SMS Code Coffee demonstrate that they have been trained and that they have the knowledge and skills to effectively implement the Chain of Custody for SMS Code Coffee. It includes farmer, processing and exporters.			
7	SMS Local operation shall enter into a binding agreement with any contractor to which processing, storing, packaging and/or labeling is outsourced. (If applicable).	Contamination and mixing SMS Code coffee vs. No SMS Code Coffe		
8	SMS Local operation implements internal inspection to ensure conformance with the Chain of Custody for SMS Code coffee.	Contamination and mixing SMS Code coffee vs. No SMS Code Coffee		
Traceability: Identification of SMS Code Coffee				
9	Traceability documentation has to be identified as " SMS Code Coffee" or other sign that permits identify SMS Code Coffee from other type of coffees.	Contamination and mixing SMS Code coffee vs. No SMS Code Coffe		
10	All traceability records related to the chain of custody will be archived for at two years.			
11	SMS Local operation implements a system for identifying the SMS Code Coffee by means of physical or visual identification.			
12	SMS Local operations shall develop and maintain records related to SMS Code Coffee such as: a) purchased and sales b) SMS Code coffee in stock; and c) total SMS Code coffee sales.	Contamination and mixing SMS Code coffee vs. No SMS Code Coffe		
13	SMS Local operation demonstrates the calculation of conversion factors, including acceptable levels of loss on processing.			
14	SMS Local operation demonstrates through to mass balance process that total SMS Code coffee sold is not more than total SMS Code purchases.			
15	SMS Local operation verifies sales documentation as contracts, invoices, traceability reports, Bill of Landing, others)			



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