



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 protecting the environment, 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**”) to which we expect our Suppliers to 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

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 local laws regarding minimum employment age and do not employ children who are under the local minimum school leaving age. We expect the same approach from our Suppliers and that a Supplier complies with the (i) United Nations Universal Declaration of Human Rights, (ii) the International Labour Organisation core labour standards, convention 182 (worst forms of child labour) and 138 (minimum age), (iii) conventions and (iv) applicable laws governing child labour, slavery, forced or compulsory labour and human trafficking. **Abuse:** Under no circumstance do we permit the use of violence, harassment or abuse in any of our operations. Our Suppliers should also operate in this way. **Discrimination:** It is our policy that no job applicant or employee receives less favourable treatment on the grounds of sexual orientation, age, race, colour, nationality, ethnic origin, religion, belief, disability or marital status or is disadvantaged 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. Our Suppliers should also operate in such a non-discriminatory way. **Diversity and inclusion.** 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 compensation:** We pay and we expect our suppliers to pay reasonable compensation and benefits that, at a minimum, comply with all applicable laws and regulations.

HEALTH AND SAFETY

Our policy is to comply with 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 should also adhere to local health and safety laws and work towards safeguarding the health and safety of their employees.

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 in order 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 practices, resulting in better farm management, yields and quality; (iii) certification to enable trade in higher value markets; (iv) access to better inputs and credit; and (v) access to better 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 supplier to establish clear milestones and processes to support their achievement. **Grievance reporting:** We encourage and expect our suppliers to encourage and provide means for their employees to report concerns, complaints, or potentially unlawful activities in the workplace, with the option 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. Suppliers will provide documentary evidence of their carbon footprint and their efforts to reduce it, 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 minimize 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 and biodiversity loss. When establishing new operations or expanding existing ones, our suppliers shall obtain all legal approvals and permissions. We also expect our suppliers to keep documentary evidence of land use history and provide it if requested.

Through supplying ECOM, you confirm that you comply with the above principles. This Supplier Code goes beyond compliance with the law and aims to advance social and environmental responsibility. We may assess your compliance with this Code at any time we have a business relationship with you, and any violations of this Code may lead to termination of our business relationship. 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>.