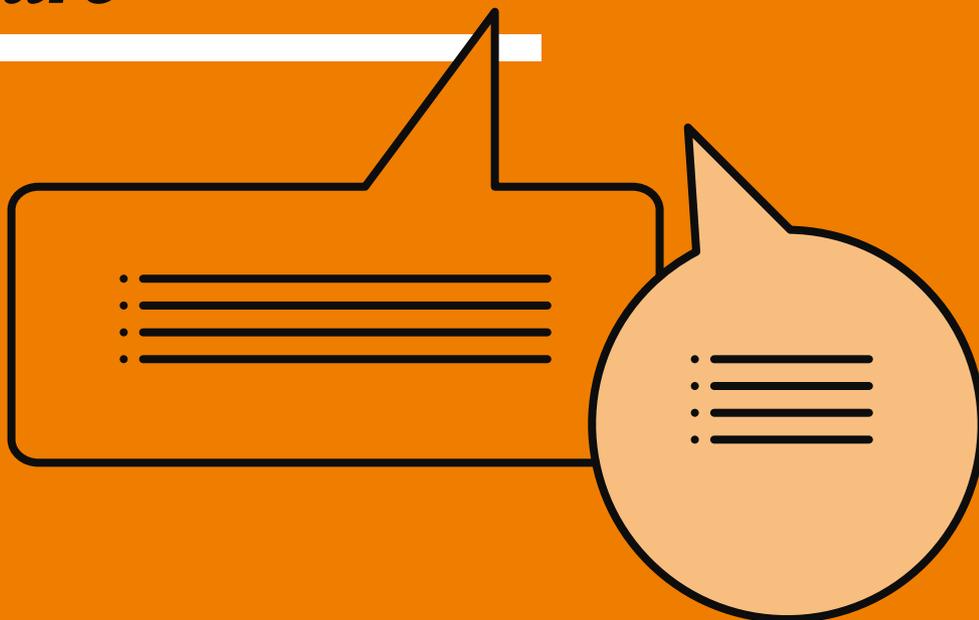


Integrity hotline

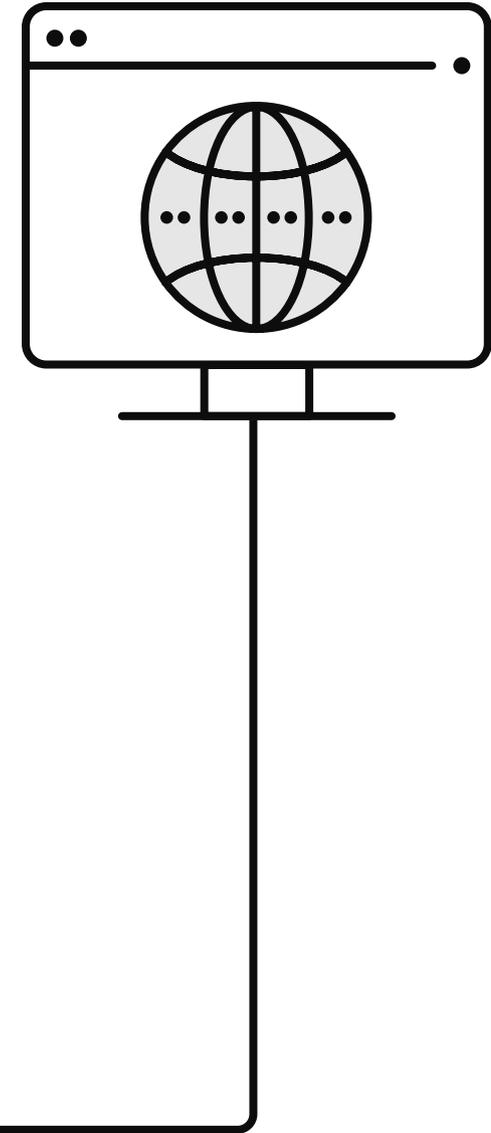
Procedure



Committed to maintaining the highest standards of business conduct

COFCO International Ltd. and its subsidiaries (hereinafter “CIL” or the “Company”) are committed to maintaining the highest standards of business conduct. This commitment is reflected in the Company’s Code of Conduct and related policies, which can be found on the CIL Intranet in several languages.

It is important to the Company that any non-compliance, act of fraud or other misconduct within CIL, or as a result of CIL’s business activity or the acts of any employee, temporary worker or contractor (hereinafter “Employee” or “Employees”), is reported and properly addressed. CIL recognises that Employees have an important role to play in achieving this goal. As part of this commitment, CIL strongly encourages Employees who have Concerns (as defined below in Section 3) to come forward and express them in order to enable CIL to investigate and address these matters.



Scope of this Procedure

This global Integrity hotline procedure (this “Procedure”) applies to all Employees and subsidiaries of CIL, and to any third-party with an interest, issue or concern with CIL or its operations (hereinafter “Stakeholders”). This includes, without limitation, agents, suppliers, customers, and neighbours of the Company or its facilities. Stakeholders are encouraged to address any concern they may have through the use of the contact details below for the CIL Corporate Code Committee and/or the CIL “Integrity hotline”.

This Procedure is designed to provide Employees and Stakeholders with a mechanism to address Concerns confidentially, anonymously and without fear of reprisal. If you are an Employee, please contact your local Human Resources Manager if you have any questions regarding what, where or how to report. Grievances regarding Employees’ individual interests, such as pay or benefits, for example, should typically be addressed through locally applicable human resources procedures.

CIL Corporate Code Committee
integrityhotline@cofcointernational.com

CIL “Integrity hotline”
www.cofcointernational.com/integrity-hotline

Implementation and application of this Procedure is supervised by the Corporate Code Committee, which consists of the Chief Audit Officer (Chairperson), Chief Legal Counsel, Chief Human Resources Officer, Head of CEO Office and Director of Corporate Affairs, or their delegates. The role of the Corporate Code Committee is to ensure that: (i) there is an independent channel to report concerns; (ii) such concerns receive proper follow-up; (iii) feedback is provided to the person reporting the concern; and (iv) recommendations are made to the Board of Directors (the “Board”) for any required follow-up actions.

This Procedure is designed to provide Employees and Stakeholders with a mechanism to address Concerns confidentially, anonymously and without fear of reprisal



Definition of a concern

A “Concern”, for purposes of this Procedure, is any issue or matter of importance which relates to any potential, real or alleged:

- Violation of law or regulation – Criminal behaviour
- Violation of any aspect of the Company’s Code of Conduct or related policies
- Facts that may directly or indirectly harm the Company’s reputation or brand image;
- Actual harm or adverse impact associated with CIL’s activities or the activities of any of its Employees; or
- Suppression, destruction or manipulation of information related to items (i) – (v) of this paragraph.

External, independent reporting channel

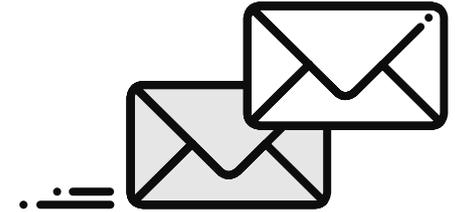
CIL has engaged an external, independent and internationally recognised service provider to design and operate an external communication channel under the name CIL Integrity hotline.

This is done both to demonstrate CIL's commitment to addressing Concerns and also to encourage Employees and Stakeholders to report their Concerns regardless of their place in or relationship to the organisation. The CIL Integrity hotline consists of phone lines, Concerns website, email address and regular mail address that are dedicated to CIL, yet managed and administered completely independent of the Company. This channel is facilitated by independent third-party professionals around the world and in local languages. Any information submitted to the CIL reporting channel will only be shared with the CIL Corporate Code Committee on an anonymous basis unless the submitter approves otherwise. All contact details required to enable Employees or Stakeholders to report Concerns are provided in Annex I to this Procedure. Both verbal and written reports can be submitted in any language.

CIL encourages Employees and Stakeholders to report any Concerns to either the CIL Corporate Code Committee or to the external CIL "Integrity hotline" (if the Concern relates to a member of the Corporate Code Committee, reporting should only be done through the external reporting channel). Concerns may be submitted in person (to a local HR representative or to a member of the Corporate Code Committee), or by phone, through the Concerns website, by email or regular mail.

For Employees, Concerns may also be reported to these channels through the local Human Resources Manager.

Although CIL always allows and encourages Employees to discuss their Concerns with their local or direct managers, this is not a requirement to qualify for protection under this Procedure.

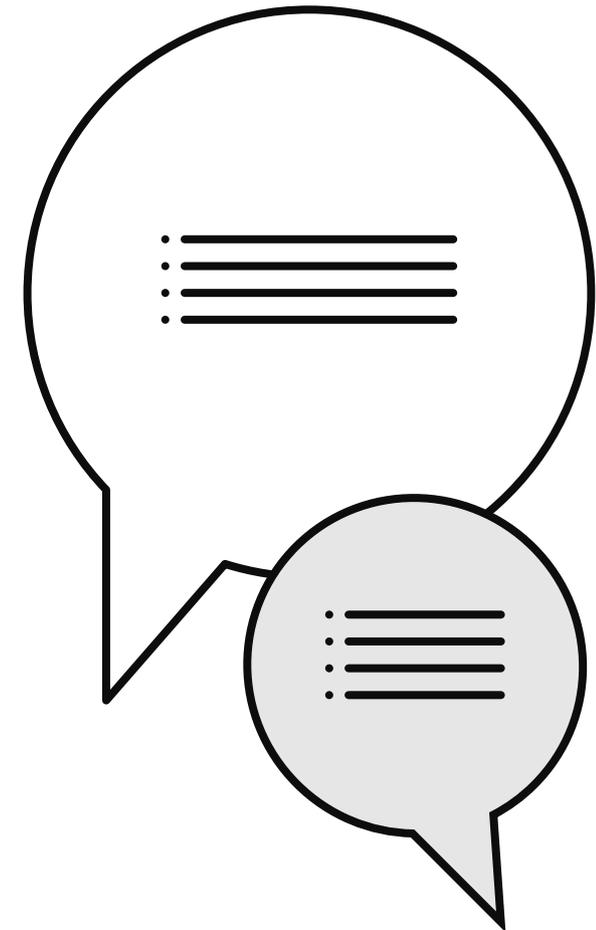
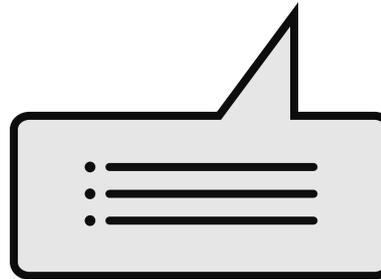


Confidentiality of Reports

The identity of Employees and Stakeholders submitting a report shall be kept confidential to the greatest extent possible, and shall under no circumstances be communicated any further without the Employee's or Stakeholder's permission. In return, the Company asks Employees and Stakeholders to maintain the confidentiality of their report and the identity of any person or persons involved in such report or in any subsequent investigation.

All information obtained through the reporting of a Concern, and in the course of any subsequent investigation, shall only be disclosed on a need-to-know and confidential basis to others involved in the investigation (e.g. members of Internal Audit, Legal, Human Resources or outside legal counsel and forensic auditors). The local Country Manager shall be informed of the investigation unless the nature of the Concern requires otherwise. If deemed necessary, or if legally required, information obtained through the reporting of a Concern or in the course of a subsequent investigation may be submitted to governmental authorities.

All information obtained through the reporting of a Concern, and in the course of any subsequent investigation, shall only be disclosed on a need-to-know and confidential basis.



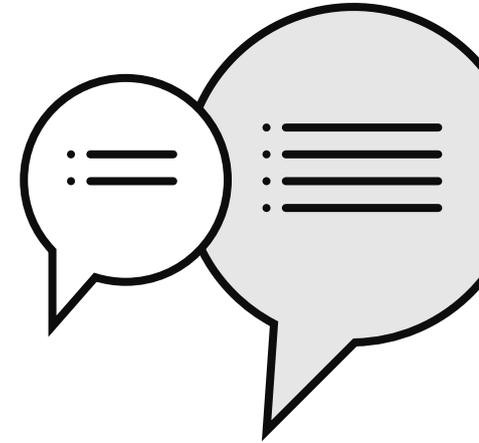
Acknowledged, reviewed, investigated

Unless a Concern was reported anonymously, it will be acknowledged in writing to the submitter within 7 days of such report. Unless the submitter chooses to remain anonymous or not to maintain further contact, all subsequent contact with the submitter will take place through the CIL Corporate Code Committee or the CIL Integrity hotline service provider, unless otherwise agreed.

Any Concern raised in accordance with this Procedure will be reviewed by a team of at least 3 individuals assembled to ensure the matter is reviewed in an independent manner (the “Investigation Team”). The Chief Audit Officer and the local Country Manager shall be informed of the investigation, unless the nature of the Concern requires otherwise. If it is necessary to ensure the professional and independent investigation of the matter, or if the Concern relates to one of the Corporate Code Committee members, the investigation shall be carried out by external investigators.

The Investigation Team will assess what follow-up (interviews, research, document requests, etc.) is appropriate. All parties involved in an investigation are expected to reasonably cooperate with the investigation.

Any person(s) implicated by the reporting of a Concern will be informed of the receipt of such report (the identity of the Employee or Stakeholder submitting the report will not be disclosed) by the CIL Corporate Code Committee as soon as reasonably possible, taking into consideration any material risk that such notification will jeopardise an effective investigation and/or that related evidence gathering shall be hampered, in which case notice will be postponed until these risks are adequately addressed. The notification shall include an outline of the alleged facts and the applicability of this Procedure (including its confidentiality and data protection aspects). The individuals involved will be provided with an opportunity to present their version of the events described in the report and in any subsequent investigation.



Information obtained through the reporting of a Concern, or in the course of a subsequent investigation, may be submitted to regulatory or governmental authorities, if necessary or required by applicable laws or regulations.

Feedback & Cooperation

After the Investigation Team has finalised its investigation of the Concern and provided the Corporate Code Committee with its report, the Corporate Code Committee shall either: (i) act on the report of the Investigation Team; or (ii) provide a recommendation for action to the Board. The Corporate Code Committee shall report to the Board on Concerns raised and actions taken on a periodic, but at least quarterly, basis. Such report to the Board will be on a consolidated basis (reports received, investigations opened, investigations closed, etc.) unless otherwise required by the Board or the materiality of a particular Concern.

The submitter shall be kept informed of the progress and outcome of the investigation through periodic, but at least monthly, updates.

Any person implicated in a reported Concern shall be notified of the outcome of the investigation (and, if applicable, any action or discipline to be taken against them) as soon as reasonably possible after the completion of the investigation.

Any individual that has reported a Concern and that is unsatisfied with the outcome of the investigation may contact the Corporate Code Committee, and identify and substantiate any issues which the individual considers to be insufficiently addressed. In response, the Corporate Code Committee may, in its sole and absolute discretion, decide to take the following action(s):

- Invite the submitter to further substantiate their complaints about the outcome of the investigation;
- Request that the submitter answer any relevant questions in this respect; and/or
- Assess any other options to resolve or more adequately address the Concern.

Protection for Employees and Stakeholders reporting a Concern
Non-Retaliation Policy

CIL takes any potential misconduct seriously, regardless of who the perpetrator is, and everyone should feel free to report any Concern they may have. CIL shall not dismiss, discharge, demote, suspend or in any way harass, penalise or discriminate against an Employee or Stakeholder who has reported a Concern in good faith, nor shall it do so with any Employee or Stakeholder who cooperates in good faith with any investigation.

Note, however, that making intentionally false statements or bad faith allegations is a violation of CIL's Code of Conduct and of this Procedure.

Any retaliation against Employees or Stakeholders who have submitted a Concern in good faith, or who are involved in an investigation, is a violation of CIL's Code of Conduct and this Procedure.

Such violations may lead to disciplinary or other action including, but not limited to, termination of employment.



Data Protection

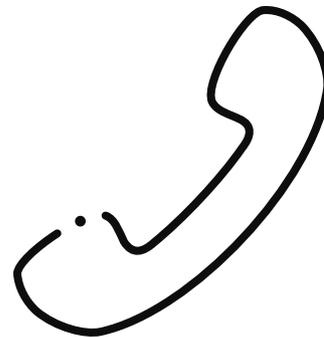
In addition to any applicable data protection laws, CIL shall act as data controller with regard to any personal data obtained from reported Concerns and any subsequent investigations under this Procedure.

Such data will only be processed to record and to investigate the Concern, and to take any required follow-up measures and to collect, assemble and distribute to management information regarding the Concerns reported.

Any personal data obtained from reported Concerns and subsequent investigations shall be kept strictly separated from Human Resources Management systems and files, except as may be required by law and/or for the purpose of taking disciplinary measures, if and when justified.

For Employees, Concerns may also be reported to these channels through the local Human Resources Manager or Compliance Officer.

Although CIL always allows and encourages Employees to discuss their Concerns with their local or direct managers, this is not a requirement to qualify for protection under this Procedure.



If you're a COFCO International employee, you can also report your concerns to either the Corporate Code Committee or the Integrity hotline.

✉ integrityhotline@cofcointernational.com

🌐 www.cofcointernational.com/integrity-hotline

Country	Language operator taking call	First step Number to dial	Second step At the Command prompt dial
Argentina	Spanish / English	0800-444-1419	–
Australia	English	1-800-60-1153	–
Brazil	Portuguese / English	0800-892-0543	–
Bulgaria	Bulgarian / English	00-800-0010	844-381-9322
Canada	French / English	1-844-381-9322 (English) 1-855-350-9393 (French)	–
China	Mandarin / English / Cantonese	4008800394	–
Colombia	Latin American Spanish / English	01-800-911-0010 (English) 01-800-911-0011 (Spanish)	844-381-9322
Cuba (Guantanamo Bay Only)	LA Spanish / English	2935	844-381-9322
Egypt	Arabic / French EU / English	02-2510-0200 (Cellular) 2510-0200 (Cairo)	844-381-9322
France	French / English	France (France Telecom): 0-800-99-0011 France (Paris Only): 0-800-99-0111 France: 0-800-99-1011 France: 0-800-99-1111 France: 0-800-99-1211 France (Telecom Development): 0805-701-288	844-381-9322
Germany	German / English	0-800-225-5288	844-381-9322
Hungary	Hungarian / English	06800-20805	–
India	English / Hindi / Marathi / Gujarati	000-117	844-381-9322
Indonesia	Indonesian / English	001-801-10 Not available from cellular phones. Use public phones allowing international access.	844-381-9322
Italy	Italian/English	800-172-444	844-381-9322
Ivory Coast	French EU / English	–	–
Kazakhstan	Kazakh / Russian / English	^800-121-4321 ^ Indicates second dial tone	844-381-9322
Mexico	LA Spanish / English	Mexico: 001-800-462-4240 Mexico (Spanish Operator): 001-800-658-5454 Mexico: 01-800-288-2872 Mexico (Por Cobrar): 01-800-112-2020	844-381-9322

^ Indicates second dial tone

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Country	Language operator taking call	First step Number to dial	Second step At the Command prompt dial
Netherlands	Dutch / English	0800-022-9111	844-381-9322
Paraguay	Spanish / English	008-11-800 (Asuncion City only)	844-381-9322
Portugal	Portuguese / English	800-800-128	844-381-9322
Romania	Romanian / English	0808-03-4288	844-381-9322
Russia	Russian / English	Russia (St. Petersburg): 363-2400 Russia (Moscow): 363-2400 Russia: 8^10-800-110-1011 ^ Indicates second dial tone Russia (Outside Moscow): 8^495-363-2400 ^ Indicates second dial tone Russia (Outside St. Petersburg): 8^812-363-2400 ^ Indicates second dial tone	844-381-9322
Saudi Arabia	Arabic / English	1-800-10	844-381-9322
Singapore	English / Mandarin / Malay	800-110-2141	–
South Africa	Afrikaans / English	0800-981-506	–
Spain	Spanish / English	900-99-0011	844-381-9322
Switzerland	German / French / Italian / English	0-800-89-0011	844-381-9322
Thailand	Thai / English	1-800-0001-33	844-381-9322
Turkey	Turkish / English	0811-288-0001	844-381-9322
UAE	Arabic / English	UAE: 8000-021 UAE (du): 8000-555-66 UAE (Military-USO and cellular): 8000-061	844-381-9322
UK & Northern Ireland	English	0-800-89-0011	844-381-9322
Ukraine	Ukrainian / Russian / English	0-800-502-886	844-381-9322
United States	English / Spanish	1-844-381-9322	–
Uruguay	Spanish / English	000-410	844-381-9322
Vietnam	Vietnamese / English	Vietnam: 1-201-0288 Vietnam: 1-228-0288	844-381-9322

^ Indicates second dial tone

CIL Corporate Code Committee

integrityhotline@cofcointernational.com

Chairperson: Chief Audit Officer (or delegate)

Chief Human Resources Officer (or delegate)

Chief Legal Counsel (or delegate)

Head of CEO Office and Director of Corporate Affairs (or delegate)

CIL “Integrity hotline”

www.cofcointernational.com/integrity-hotline

This Procedure applies to:

Employees and Stakeholders

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Version:

November 2018

Repository

This Procedure is available on the CIL Intranet

