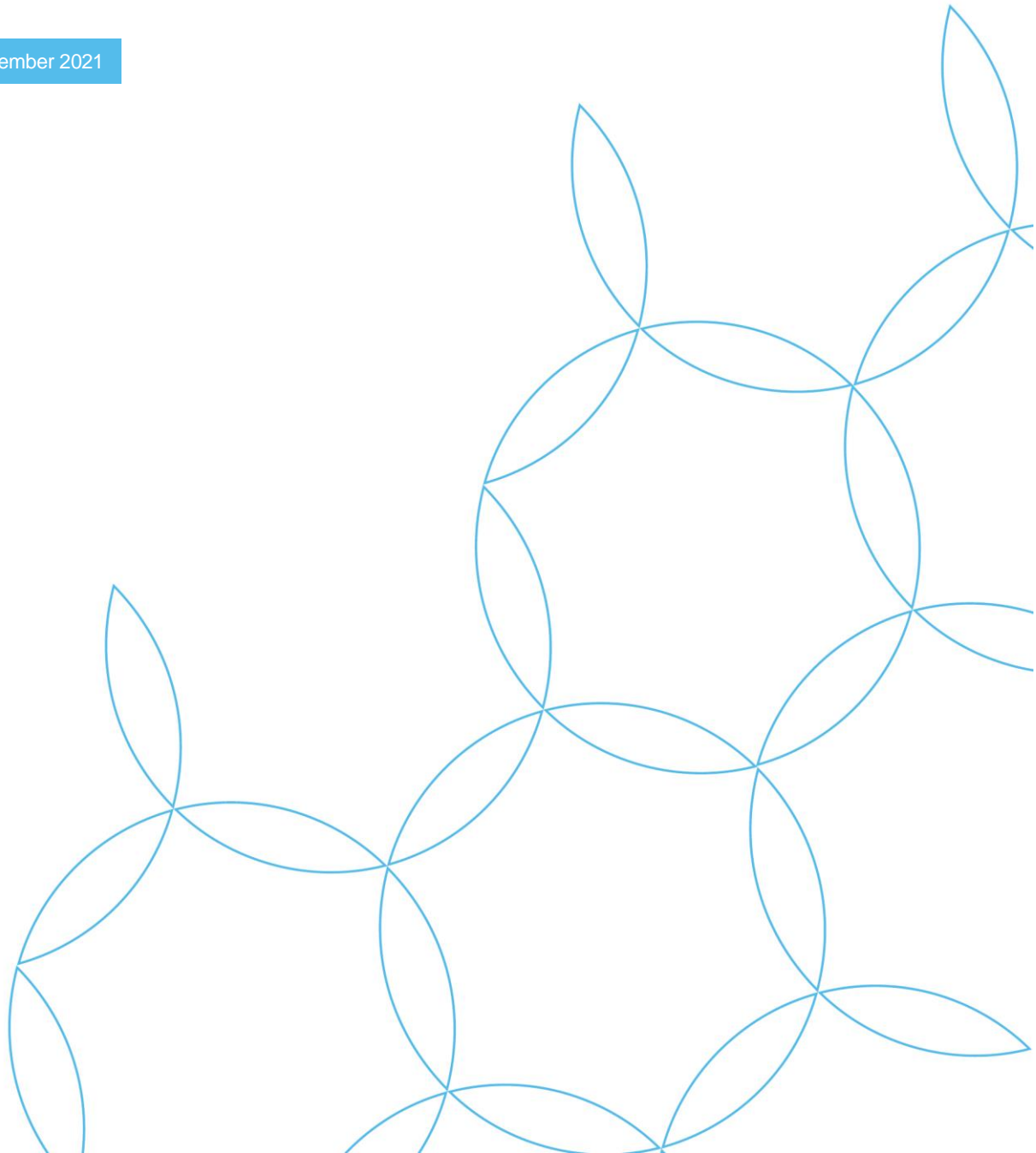




中粮国际
COFCO INTL

Supplier Code of Conduct

Version 03 | 22 December 2021



Contents

1/ Key Policy Points	3
2/ Purpose	3
3/ Scope	3
4/ Policy Statements	3
General Principles for all COFCO International suppliers.....	3
Additional Principles for agricultural commodity suppliers.....	5
5/ Implementation	5
6/ Non-compliance	6
Reporting misconduct.....	6

1/ Key Policy Points

- COFCO International commits to sustainable and responsible sourcing and procurement practices.
- All our suppliers are expected to comply with a set of General Principles under this Code.
- In addition, all suppliers of agricultural commodities are expected to comply with Additional Principles set forth in this Code, while suppliers of soybean and palm oil are also expected to comply with the principles stipulated in COFCO International's commodity-specific sourcing policies.
- We will develop procedures to assess supplier performance against this Code.
- We provide grievance channel for stakeholders to report non-compliance with this Code and ensure non-compliances are solved in a transparent, consultive and effective manner.

2/ Purpose

COFCO International actively pursues long-term relationships with its suppliers based on responsible and sustainable business practices. This Policy outlines the principles and requirements we expect our suppliers to adhere to, which will support us in achieving a supply chain and procurement practice with a high degree of integrity and is socially responsible, environmentally sustainable and economically profitable.

3/ Scope

The General Principles stipulated in this Code apply to all our suppliers, while Additional Principles apply to our agricultural commodity suppliers. We expect them to uphold and respect these Principles and to disseminate and educate their employees, agents and sub-tier suppliers on the content of these Principles. Should a supplier fail to comply with these Principles, COFCO International reserves the right to demand corrective measures to promptly rectify any such failure, which may lead to remedial measures, including for example immediate termination of business relationship without the payment of any indemnity for early termination.

COFCO International may actively verify (by its own means and efforts) if the supplier and/or the supplier supply chain (as applicable) comply with this Code.

While the supplier size and sophistication will be taken into consideration in its evaluation, COFCO International expects every supplier to fully commit and comply this Code.

4/ Policy Statements

General Principles for all COFCO International suppliers

Business ethics and compliance

- Comply with all applicable laws and regulations, treating them as minimum standard, and conduct business with a high degree of integrity;
- Not to practise nor tolerate, directly or indirectly, with any form of corruption, extortion or embezzlement - including – but not limited to - any fraud, bribery, extortion, deception, abuse of power or money laundering. Suppliers will not, directly or indirectly, offer or accept bribes or other unlawful incentives. This includes offering any valuable item and/or any kind of personal benefit to our employees such as travel, frequent meals, expensive gifts or cash equivalents unless if there is a direct link to business arrangements and a genuine business reason can be demonstrated;
- Avoid any relationship with a COFCO International employee that might conflict, or appear to conflict with the employee's obligation to act in the best interest of the company. This includes, for a COFCO International employee that has exclusivity commitment with COFCO International, any parallel business activities the employee may be pursuing;
- Extend the supplier obligations and commitments against any form of corruption, extortion or embezzlement - including – but not limited to - any fraud, bribery, extortion, deception, abuse of power or money laundering under this Code to its own suppliers, agents and/or subcontractors (especially to those engaged in the supply to COFCO International);
- Maintain financial books, records, and accounts related to its business with COFCO International that (i) complies with (x) any applicable legal or regulatory rules (in the jurisdictions where they operate), (y) local accounting standards and/or (z) international accounting standards, and (ii) accurately reflect all transactions. Suppliers must provide a copy of these records to COFCO International upon request;
- Safeguard and make only appropriate use of any confidential or proprietary information of COFCO International, unless authorised on the contrary by written agreement (always observing the actual individual contractual obligations

and standards on confidential information, for each COFCO International transaction with the supplier) or compelled to do so by law.

- Suppliers shall not (i) infringe, steal, take improper advantage of COFCO International's intellectual property rights, and/or (ii) attempt to infringe COFCO International's intellectual property rights in any way. Intellectual property rights shall be interpreted broadly, always in addition to any legal or contractual standards/rules applicable, and shall include, but not be limited to, any rights, information, process, procedure, trade secret, trademark, logo, among others.
- It shall be irrelevant, for the supplier's obligation, whether (i) the COFCO International's intellectual property rights are registered or not, in which case the supplier shall always protect COFCO International's intellectual property and act assuming that they are, and/or (ii) if the COFCO International's intellectual property rights are protected in a specific jurisdiction or not, as the supplier shall act in a manner to protect and observe the COFCO International's intellectual property globally; and
- Commit to the best standards and to act in good faith to resolve complaints, conflicts, disputes, and grievances in a timely and appropriate manner, ensuring the protection of complainants, communicating with transparency and honesty, and delivering on commitments.

Human and labour rights

- Protect the human rights of its workers and contract workers as set out in the International Labour Organization's (ILO) eight Core Conventions and as expressed in the International Bill of Human Rights, and treat them with dignity and respect, in line with the United Nations Guiding Principles on Business and Human Rights (GPBHR);
- When faced with conflicting requirements between local law and human rights standards, seek ways to honour the principles of internationally recognised human rights standards whilst ensuring at least compliance with all applicable laws, in line with guiding principle 23 of the GPBHR, and when not legally forbidden in a specific jurisdiction, with the best international human rights standards;
- Grant employees the right to freely associate, organise and bargain collectively in accordance with applicable laws and regulations (in jurisdictions where it is allowed and in any jurisdictions where that is not forbidden);
- Only employ workers and contract workers who meet the applicable minimum legal age requirement and not tolerate any form of child labour, in its own activities and/or in the activities of third parties acting on the suppliers' behalf (its own suppliers, agents and/or subcontractors), either providing services to COFCO International or to any other supplier's business partner;
- Not tolerate slavery, any conditions analogous to slavery, servitude, forced or compulsory labour, human trafficking, nor any corporal punishment or disciplinary practices that undermine human rights and individual dignity, in its own activities and/or in the activities of third parties acting on the suppliers' behalf (its own suppliers, agents and/or subcontractors), either providing services to COFCO International or to any other supplier's business partner;
- Not tolerate any form of discrimination, harassment, nor the use of any form of violence, including gender-based violence, in line with the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and ILO Convention 190, in its own activities and/or in the activities of third parties acting on the suppliers' behalf (its own suppliers, agents and/or subcontractors), either providing services to COFCO International or to any other supplier's business partner;
- Respect diversity, promote gender equality, and safeguard and ensure women's reproductive health rights (especially those applicable to health and safety in the work environment); and
- Provide pay and conditions for workers and contract workers (without gender discrimination) that meet at least legal standards, including minimum salary, equal payment for different genders, overtime payment, work hours, coverage for work-related illness or injuries, and other conditions.

Occupational Health and Safety (OHS)

- Provide a safe and healthy work environment to all employees, including migrant workers and seasonal labourers. As a minimum, safe and clean drinking water, proper accommodation (when applicable), electricity, emergency healthcare, essential personal protective equipment, adequate sanitation facilities, fire safety and machine safeguarding must be made available to all employees;
- Work towards continuous improvement of OHS performance, possibly by establishing and maintaining a management system, consistent with ISO 45001 and
- Ensure that these standards apply in its own activities and/or in the activities of third parties acting on the suppliers' behalf (its own suppliers, agents and/or subcontractors), either providing services to COFCO International or to any other supplier's business partner.

Local Communities

- Commit to respect the local communities where they operate (especially for those hazardous and high impact activities) and, when possible, have a social impact in those communities;
- Respect local leaders and, whenever requested, engage in dialogue with them regarding the impact of the supplier activity on the local communities where it operates.

Environmental Management

- Commit to meet the environmental legislation and/or local or international standards (if higher than those set in local environmental legislation) inherent to the business activities;
- Use renewable and non-fossil fuel energy, as well as climate-friendly products wherever possible, contributing to the reduction of greenhouse gas (GHG) emissions;
- To the extent possible, seek to implement measures that contribute to decarbonisation and/or capture of carbon of own operations and supply chain;
- Use water efficiently by minimising withdrawal, preventing pollution, avoiding downstream adverse impacts on communities and ecosystems, and taking additional resource efficiency measures in water-stressed areas;
- Minimise, re-use and recycle waste where possible and dispose of waste in a responsible way; and
- Work towards continuous improvement in environmental performance to prevent, control and mitigate impact, possibly by establishing and maintaining a management system, consistent with ISO14001.

Supply Chain Management

- Uphold sound supply chain management to ensure that sub-suppliers well understand and comply with sustainability principles outlined in this Code;
- Ensure that the supplier supply chain strictly observe those standards of this Code where specific compliance obligations are extended to its own suppliers, agents and/or subcontractors.

Additional Principles for agricultural commodity suppliers

Trade Sanctions

- Comply with applicable trade sanctions laws and regulations; and
- Refrain from engaging in any transaction with a sanctioned party or country or using another party to carry out activities that could not be lawfully performed directly due to trade sanctions prohibitions.

Sustainable agricultural practices

- Use environmental practices that avoid deforestation and protect against conversion of natural and critical habitats leading to a loss of biodiversity;
- In the benefit of natural and critical habitats, promote reforestation in the sites and/or in the local communities;
- Apply best agricultural practices that enhance soil fertility and prevent erosion;
- Strictly avoid any parallel/black markets available, using only the formal markets where best practices are followed and certified (certification shall be routinely included in the supplier and the supplier supply chain procedures and business practices);
- The certification accepted shall only be those issued (i) by certifiers with a good reputation in the market and (ii) preferably recognized by the applicable jurisdiction governmental authorities or international authorities;
- Use agrochemicals consistent with good agricultural practices, with the least effect on the human health (both local communities and consumers) and based on crop requirements; and
- To the extent possible, account for physical, transition, and reputational risks related to climate change, including those affecting water resources and the security of food systems, and use environmental practices that seek to minimise the potential impact of those risks.

Land rights

- Adhere to responsible governance of land tenure and respect land rights of local and indigenous communities, including legal and customary land rights;
- Respect Free, Prior and Informed Consent (FPIC) from indigenous peoples and local communities for the use of their customary lands prior to agricultural development and for all new developments which may affect indigenous peoples' and local communities' rights, land, resources, territories, livelihoods, and food security, respecting their right to grant or withhold said FPIC; and
- Actively fight against abusive and/or criminal practices against the above mentioned rights, either by (i) ensuring the supplier supply chain commits and observes these rights and practices, (ii) not engaging in any parallel/black market that takes advantage from the abuse or criminal offense against the above mentioned rights, and (iii) by cooperating, and assuring that the supplier supply chain cooperates, with local and international authorities in their efforts to prevent or stop any abuses and/or criminal offenses.

Supply chain transparency

- Wherever possible and when requested, provide, to the extent the commodity value chain allows, traceability of commodity sourcing to site of production.

5/ Implementation

We will develop clear procedures to assess suppliers' performance against this Code.

In addition, for agricultural commodities with prominent supply chain environmental and social challenges, including soybean and palm oil, we have developed commodity-specific sourcing policies to guide our suppliers' implementation of this Code. Please refer to our Sustainable Soy Sourcing Policy and Sustainable Palm Oil Sourcing Policy (available at: www.cofcointernational.com).

6/ Non-compliance

Reporting misconduct

COFCO International will seek collaboration with our suppliers and other stakeholders to assist the implementation of this Code. We encourage stakeholders to report potential non-compliances via COFCO International Integrity Hotline (cofcointernational.ethicspoint.com).

Similarly, suppliers who believe that an employee of COFCO International, or anyone acting on its behalf, has engaged in illegal or otherwise improper conduct, should report the matter to COFCO International. Suppliers can contact the employees' manager or use our Integrity Hotline. Relationships with COFCO International will not be affected by an honest report of potential misconduct.