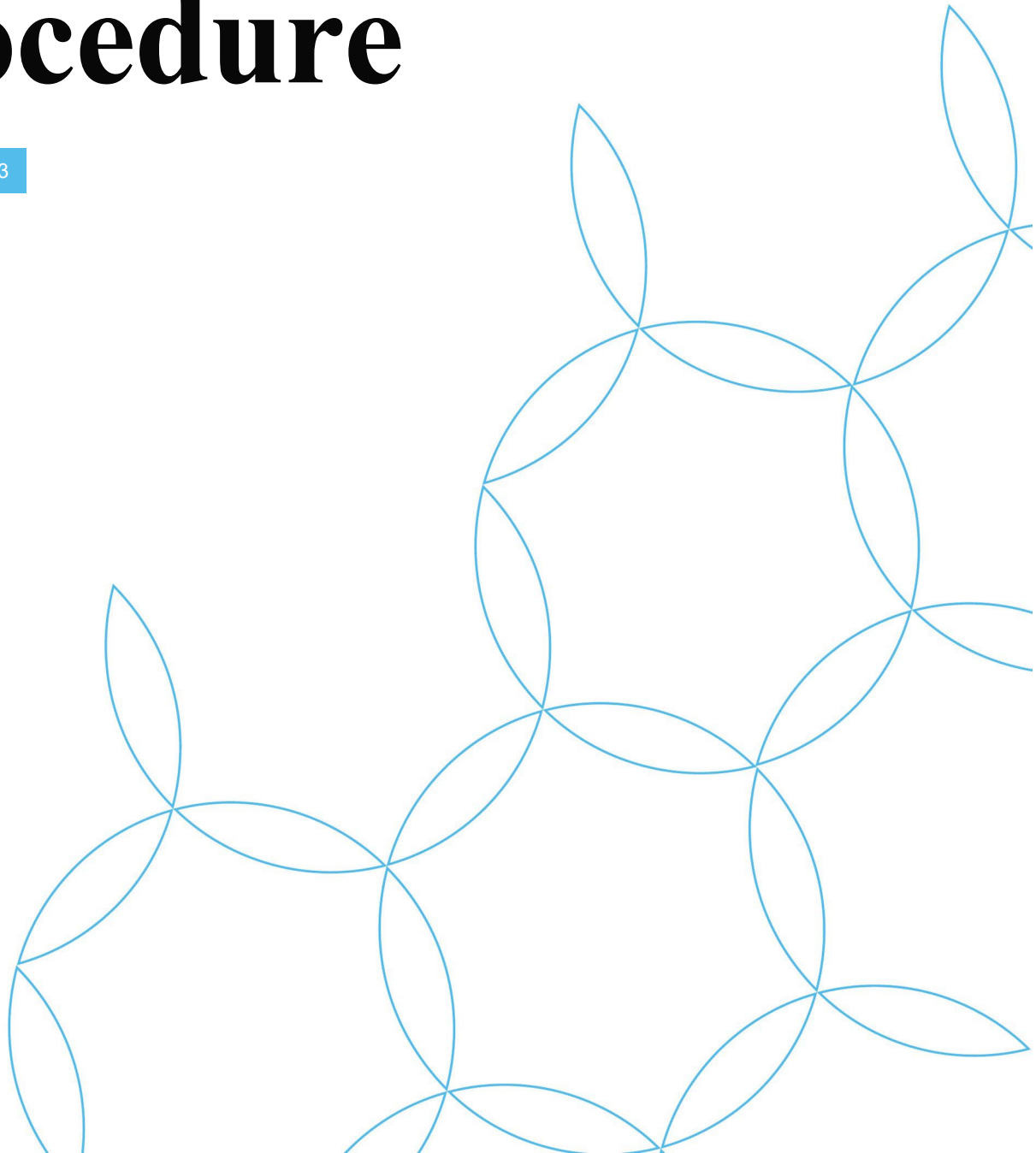




COFCO INTL

Integrity Hotline Procedure

Version 2 | Dec 2023



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1/ Key Procedure Points

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”), or stakeholders (e.g. customers and suppliers) is reported and properly addressed. CIL recognises that Employees and stakeholders have an important role to play in achieving this goal. As part of this commitment, CIL strongly encourages Employees who have Concerns to come forward and express them in order to enable CIL to investigate and address these matters.

2/ Purpose and Scope

The purpose of the Integrity Hotline Procedure is as follows:

- 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 Integrity Hotline channels listed in the Annex.
- 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.
- Implementation and application of this Procedure is supervised by the CIL Concerns Management Committee. The role of the CIL Concerns Management 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”) and/or CEO for any required follow-up actions.

3/ Principles

This procedure is prepared under the framework of CIL’s Code of Conduct and ISO 37002 standard (Whistleblowing management systems— Guidelines).

4/ Key Interfaces

The key interfaces to this procedure are:

- Data protection and data privacy laws and regulations
- ISO 37002:2021 Whistleblowing Management Systems – Guidelines
- Internal Audit Guideline for Managing the Integrity Hotline Cases
- CIL and Group policies as applicable, including but not limited to:-
 - CIL Code of Conduct
 - CIL Global Investigation and Disciplinary Policy
 - Integrity Hotline Privacy Policy

5/ Reporting Concerns

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 channels (specifically for phone, web intake page, and mobile phone intake page) 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 Concerns Management 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 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 Concerns Management Committee or to the external CIL "Integrity hotline" (if the Concern relates to a member of the Concerns Management Committee, reporting should only be done through the external reporting channel). Concerns may be submitted in person (to Internal Audit or to a member of the Concerns Management Committee), or by phone, through the website, or mobile phone intake page, or email.

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

All information obtained through the reporting of a Concern, and in the course of any subsequent investigation, will be treated with the utmost confidentiality and disclosed only on a need-to-know basis. CIL is committed to protecting the privacy and sensitive information of all individuals involved.

The name or other personal related data 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 kindly requests Employees and Stakeholders to maintain the confidentiality of their report and the identities of any individuals 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 confidential need-to-know basis to individuals directly 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. Additionally, when applicable, the Data Protection Officer (DPO) may be consulted in exceptional cases to ensure that privacy regulations are adhered to during the investigation process. 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 shared with governmental or public authorities.

Acknowledged, Reviewed, Investigated Reports

A concern reported 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 Concerns Management 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 2 individuals assembled to ensure the matter is reviewed in an independent manner (the “Investigation Team”). The Chief Audit Officer must 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 Concerns Management Committee members, the investigation shall be carried out by external investigators (the Regional Head of Internal Audit must consult with the Chief Audit Officer).

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.

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 and Cooperation

Where a formal report is prepared, the following shall be performed: After the Investigation Team has finalised its investigation of the Concern and provided the Concerns Management Committee with its report, the Concerns Management Committee shall: provide a recommendation for actions to the Disciplinary Committee, CEO, and/or Board. The Concerns Management Committee shall report to the Board and/or CEO on Concerns raised and actions taken on a periodic, but at least on a quarterly, basis. Such report to the Board and/or CEO 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 2-monthly, updates.

Any individual that has reported a Concern and that is unsatisfied with the outcome of the investigation may contact the Concerns Management Committee, and identify and substantiate any issues which the individual considers to be insufficiently addressed. In response, the Concerns Management 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 of 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.

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.

Data Protection

Data protection and privacy is of paramount importance to CIL. CIL is dedicated to safeguarding the privacy and confidentiality of any personal data that may be collected through our Integrity Hotline. This commitment extends to adhering to all applicable data protection laws and regulations.

With regards to any personal data obtained from reported Concerns and any subsequent investigations under this Procedure, CIL shall act as a data controller, while our trusted service provider will be deemed as a data processor. A data processing agreement between CIL and our external service provider is in place to ensure the secure and lawful processing of personal data.

Personal data collected will be used exclusively for investigating and addressing reported concerns, with the goal of upholding ethical standards and compliance.

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.

For a comprehensive understanding of our data protection practices, your rights, and how we handle personal data through the Integrity Hotline, please refer to our established policies: Integrity Privacy Policy, Data Privacy Policy and Employee Privacy Policy. These policies outline our commitments to data protection, data protection rights, and the mechanisms in place to ensure the security and confidentiality of personal data.

6/ Archive

Relevant information on the Integrity Hotline shall be properly filed and kept in accordance with the records management requirements and respective data privacy regulations.

7/ Definitions and Abbreviations

CAE	Chief Audit Executive or Chief Audit Officer or Group Head of Internal Audit
CIL	COFCO International Limited
CMC	Concerns Management Committee
Concern	A "Concern", for purposes of this Procedure, is any issue or matter of importance which relates to any potential, real or alleged: <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Suppression, destruction or manipulation of information related to items (i) – (v) of this paragraph.
Data	The natural or legal person, public authority, agency or other body which, alone or jointly with others,
Controller	determines the purposes and means of the processing of personal data. Controllers make decisions about processing activities (GDPR).

Data	The natural or legal person, public authority, agency or other body which processes personal data on behalf
Processor	of the Data Controller accordance with their instructions and for specific purposes, while not making independent decisions about the data processing activities (GDPR).
ISO	International Organisation for Standardization
KPIs	Key performance indicators
RCMC	Regional Concerns Management Committee

8/ Annexes

Reporting Channel Details

If you're a COFCO International employee or stakeholder, you can report your concerns to Management, Human Resources, Concerns Management or the Integrity hotline. The details of the Integrity hotline reporting channels are as follows:

- Web intake page: <https://www.cofcointernational.com/integrity-hotline>
- QR code or mobile phone intake page: <https://cofcointernational.navexone.eu/>



- Telephone (refer to Annex for list of contact numbers per country)
- Email: integrityhotline@cofcointernational.com

Telephone Contact Numbers

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

9/ Document Information

Accountabilities

Responsible Officer	Chief Audit Officer
Contact Officer	Lily lei Deng

Supporting Information

Legislative Compliance	Nil
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Supporting Documents	ISO 37002:2021 Whistleblowing Management Systems – Guidelines
Related Documents	CIL Code of Conduct Concerns Management Committee Charter Global Investigation and Disciplinary Policy Internal Audit Guideline for Managing the Integrity Hotline Cases Integrity Hotline Privacy Policy
Superseded Documents	Nil
File Number	Nil

Revision History

Version	Approved by	Approval date	Effective date	Sections modified
1.0	Chief Audit Officer	November 2018	November 2018	All
2.0	Chief Audit Officer	December 2023	December 2023	All, DPO input