Supplier Code of Conduct



PURPOSE AND SCOPE

At Tradin Organic, we are committed to an ethical and transparent way of doing business and believe that this is crucial for a stable, long-term, and sustainable access to our ingredients. We expect our suppliers and sub-suppliers to show the same commitment.

This Supplier Code of Conduct ("Supplier Code") intends to clarify our definition of ethical business standards relating to business integrity, labor practices, associate health and safety, and environmental management. The Supplier Code is grounded in the Global Code of Conduct of Acomo, the holding company. All partners must be prepared to provide Tradin Organic with information about subjects mentioned in this guideline and to be audited by Tradin Organic or an authorized 3rd party representative. Suppliers are also expected to conduct reasonable due diligence at sub-suppliers. Through this process, we strive to monitor the social and environmental impact of our supply chains and support our suppliers to continuously improve their operations.

Suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Tradin Organic entities worldwide are expected to follow this Code. In case of noncompliance the business relation can be terminated.

BUSINESS INTEGRITY AND LEGAL COMPLIANCE

- 1. Maintain awareness and comply with all applicable laws and regulations of the countries of their operations.
- 2. Compete fairly for Tradin Organic's business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage. Tradin Organic is committed to conducting business legally and ethically within the framework of a free enterprise system. Fraud and corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. Tradin Organic suppliers are prohibited from providing or offering gifts to Tradin Organic employees that could inappropriately influence Tradin Organic's business decisions or gain an unfair advantage.
- **3. Avoid conflict of interest.** Suppliers must avoid any situation or relationship that may involve an inappropriate conflict of interest or the appearance of a conflict of interest in their dealings with Tradin Organic.
- 4. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations. Our goal is to do business with partners who serve as good stewards in society and in their communities and share our commitment to the environment. Suppliers must conduct their business in a manner that complies with all applicable environmental laws and regulations. We encourage continuous monitoring, evaluation, and improvement by the supplier of social and environmental performance, including, but not limited to responsible use of raw materials and natural resources, water stewardship and wastewater management, greenhouse gas emissions reduction, responsible sourcing practices, and operations designed to reduce activities that have a harmful impact on the environment.
- **5. Full traceability in production and/or supply chain of all materials originating from all sources.** The supplier shall be capable of disclosing the country of origin and source up to field level immediately upon request. Tradin Organic reserves the right to ask the supplier to create, at any point in time, a full supply chain map to facilitate assessment of upstream supply chain visibility and compliance.
- **6. Deliver products and services meeting applicable quality and food safety standards and regulation.** Tradin Organic is committed to producing high quality and safe products. Suppliers involved in any aspect of developing, handling, packaging or storing our products are expected to:
 - Know and comply with the product quality standards, policies, specifications, and procedures that apply to the products produced at your location
 - Follow and adhere to good manufacturing practices and testing protocols
 - Have performed and documented a product defense hazard analysis including precautions that have been taken
 - Comply with all applicable federal, state, and local food safety laws and regulations

- Report issues immediately to Tradin Organic that could negatively affect the quality or public perception of a Tradin Organic product
- Have a maintained and functioning HACCP system.
- **7. Not to disclose nonpublic information regarding Tradin Organic or its operations.** Suppliers must be sensitive to the kinds of information that constitutes Tradin Organic's confidential and proprietary information. Confidential and proprietary information is that which is not known or available to the public and which might adversely affect Tradin Organic's interests if it were disclosed.

HUMAN RIGHTS, WORKPLACE SAFETY, ANIMAL WELFARE

- **8. Maintain and promote fundamental human rights.** Employment decisions will be based on free choice and there may be no coerced, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.
- **9. Respect employees' right to freedom of association and collective bargaining, consistent with local laws.** Consistent with applicable law, Tradin Organic suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations.
- 10. Provide safe and healthy working conditions. Tradin Organic suppliers shall proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement systems and controls that identify hazards and assess and control risk related to their specific industry. Also, suppliers shall provide potable drinking water and adequate restrooms; personal protective equipment; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.
- 11. Prohibit use of child labor. Suppliers shall adhere to the minimum employment age limit defined by national law or regulation, and comply with relevant International Labor Organization (ILO) standards. In no instance shall a supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental, or emotional development or improperly interfere with their schooling needs.
- 12. Treat employees fairly, including with respect to wages, working hours and benefits. Tradin Organic suppliers shall comply with all applicable legal and regulatory requirements and will generally apply sound employee relations practices. Working hours, wages, benefits will be at least consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits.
- 13. Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse. Tradin Organic suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance and experience.
- 14. Commit to the responsibility to ensure animals are treated with respect and dignity. Suppliers are expected to meet or exceed the Five Freedoms adopted by the UK Farm Animal Welfare Council and supported by the Paris-based Organization for Animal Health. These five freedoms are commonly held as a global standard for the fair and ethical treatment of animals. In addition, the exploitation of wild animals in business activities should be prohibited.

PROCEDURAL AND ADMINISTRATIVE EXPECTATIONS

- 15. Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.
- 16. Support compliance with the Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Tradin Organic. Suppliers themselves must enter into contracts with partners and sub-suppliers that are in line with this Supplier Code.
- 17. Report (suspicion of) any illegal or otherwise improper conduct, of the supplier, or an employee of Tradin Organic, or anyone acting on behalf of Tradin Organic.