Due Diligence System



Tradin Organic is a global company in the organic food industry and with that, takes responsibility of its impact on people and nature across its supply chains. We are committed to a responsible and transparent way of doing business and believe that this is crucial for a stable, long-term, and sustainable access to our ingredients.

Tradin Organic is a member of the Supplier Ethical Data Exchange (<u>SEDEX</u>) and has achieved the <u>We Care</u> <u>certification</u>. We Care is a corporate sustainability label for the management approach to impacts across supply chains and shows commitment to continuous improvement.

OUR POLICIES

This document outlines Tradin Organic's overall Due Diligence System, based on the <u>OECD Guidance for responsible business conduct</u>. This system is a continuous process that helps identify risks relating to human rights, labour rights and the environment with a view to ending, preventing or mitigating those risks.

All employees of Tradin Organic and its entities across the world sign the <u>Acomo Code of Conduct</u>, a group policy set by the holding company Acomo N.V. The group also has two additional policies: the <u>Acomo Human rights Policy</u> and <u>Acomo Environmental Policy</u>. Tradin Organic has developed two specific Sourcing Policies for additional measures in supply chains associated with risk, for its own sourcing activities as well as when sourcing through local partners:

- The Ethical Sourcing Policy (ESP) to protect farmers and workers in our supply chains.
- The **Deforestation-free Sourcing Policy** (<u>DSP</u>) to protect forests in countries of origin.

These policies are also incorporated into our **Supplier Code of Conduct** (<u>SCoC</u>), which is mandatory to sign for all Tradin Organic suppliers.

RISK AND IMPACT MANAGEMENT

We maintain a country and/or product risk score for each topic covered in our Sourcing Policies and Supplier Code of Conduct in our **Risk Monitor**. Our Risk Monitor combines various information sources, from public acknowledged lists such as the <u>amfori BSCI Country Risk Classification</u>, <u>Fairtrade Risk Map</u>, <u>FAO statistics</u> and <u>Global Forest Watch</u> and to intel gathered by our local teams, including on regulatory developments. Tradin Organic employs an extensive international team of locally stationed staff, field scouts and agronomists who work directly with farmers, processors and local governments.

For raw materials from countries or product groups with risk, Tradin Organic requires transparency and assurance in a way that it deems appropriate to the situation, including whether there is a direct or indirect relationship with the producers. The goal is either:

- Certification or auditing by an independent third party, or
- Verification by Tradin Organic staff of information provided through our supplier questionnaires.

The two Sourcing Policies further specify the conditions and requirements. Both policies state that in case we cannot verify a sufficient level of transparency and assurance of compliance by a supplier, the consequences may include ceasing the business relation.

TRACKING AND COMMUNICATION

Tradin Organic closely monitors the status and progress of its supply base and commits to publicly report the certified and verified share on an annual basis. On request, findings and supplier status can be shared with clients, so they can integrate these reports into their own due diligence system and comply with applicable regulation.

Tradin Organic also reports on various ESG and impact indicators to its holding company Acomo N.V. on a quarterly basis. This includes the volume of products that is certified and the number of suppliers that are certified or audited. Acomo reports on progress on group level in the group's Annual Report (available on the <u>website</u>).

PREVENTION, REMEDIATION AND REGENERATION

Tradin Organic's way of working is not to only identify risks and mitigate them, but to actively work together with the sourcing communities and suppliers to ensure responsible conduct throughout the value chain. We are known for our technical assistance projects, where the goal is to improve farmers' and producers' livelihoods and overall resilience. These projects focus on setting up organizational structures such as farmer cooperatives, Farmer Field Schools or village saving and loan associations (VSLA's), and providing knowledge, certification guidance, training, machinery, planting materials, agroforestry designs and/or organic inputs.

GRIEVANCE MECHANISM

All stakeholders of Tradin Organic and its suppliers, internally and externally, can report perceived or suspected breach of any of the Codes and Policies referenced in this document. The formal grievance mechanism SPEAK UP! is freely accessible through our website, with the option to submit a report anonymously. The reports are received by the Compliance Officer at Acomo N.V., who will follow up accordingly and keep the reporter updated on any actions taken. The number and status of grievances reported through the group mechanism are disclosed in the Acomo Annual Report.