



## Grievance Mechanism Policy

### Purpose and Scope

Sucden's Management Board encourages its employees, business partners (including but not limited to its suppliers and clients), the employees of its business partners, and any person or group of persons, directly or indirectly involved in its business operations (its "**Stakeholders**") to disclose any serious irregularity or professional misconduct committed by and/or involving Sucden, its Stakeholders, its business operations and/or the business operations of its Stakeholders, that they have personally witnessed and have reason to believe is in contradiction of Sucden's Code of Conduct and/or policies, and of any applicable law and/or regulation (the "**Grievance(s)**").

To achieve this purpose, Sucden's Management Board is implementing this Grievance Mechanism Policy with the full intention to:

- Encourage any person or group of persons, acting in good faith, to report any Grievance;
- Protect any person or group of persons that report a Grievance from any discrimination or retribution that may result from their report, notably, by guaranteeing that all such Grievance reports shall be dealt with on a confidential basis and in accordance with the relevant legal framework;
- Define a lawful and protective framework (especially with respect to the protection of personal data) and a mechanism to effectively and efficiently process and investigate the reported Grievance, and to cure such Grievance (when proven to be true) with all appropriate and available remedies.

### Grievance Reporting

For Grievances reported by Sucden's employees, the initial report should be referred in writing either to:

- their direct or indirect superior and/or to their Local Compliance Officer, or any other person designated for this purpose, and to their professional electronic email address, on a non-anonymous basis; or to
- the following designated electronic email address, on an anonymous or non-anonymous basis: [grievance@sucden.com](mailto:grievance@sucden.com).

For Grievances reported by non-Sucden employees that relate either to Sucden or one of its Stakeholders, the initial report should be referred in writing to:

- the abovementioned electronic email address, either on an anonymous or non-anonymous basis; or
- the nearest Sucden's Local Compliance Officer, in person.

A Grievance may validly result from the following irregularities and/or misconduct (although this list is by no means exhaustive):

- Crimes or criminal offences, including but not limited to corruption<sup>1</sup>, money laundering, financing terrorism, theft, market abuse or fraud;
- Serious irregularities in financial accounting;
- Deliberate concealment of abuses, irregularities, misdemeanors, felonies, crimes and/or criminal offenses;
- Any actions in contradiction of Sucden's Code of Conduct, Human Rights Policy, Forest Protection Policy for Operations Within The Cocoa & Coffee Supply Chains, or any other published guidelines, policies, or commitments regarding Sucden's operation as a responsible business.

The Grievance report shall, in all circumstances, be made in good faith and be of a serious nature. Additionally, a Grievance report shall contain as much detail as possible to allow its full and effective assessment, including in all circumstances, the following information:

- A detailed description of the irregularity and/or misconduct witnessed and the specific circumstances surrounding the incident;
- The date of occurrence of the irregularity and/or misconduct (where an irregularity and/or misconduct have persisted over time, a description of the suspected timeline should be provided wherever possible);
- The identity, if known, or a physical description of the person(s) involved in the irregularity and/or misconduct;
- The identity, if known, or a physical description of any other witnesses or participants that may be involved;
- Any documents that support the report of the irregularity and/or misconduct.

The person making the report may choose, at their own discretion, to do so anonymously. However, the person making the report understands that they may be asked to disclose their identity when necessary for the continuation of the investigation, in particular before the competent legal authorities and/or courts of law.

All information collected relating, directly or indirectly, to the Grievance report and the subsequent investigation shall be kept strictly confidential unless the disclosure of such information is required by competent legal authorities and/or courts of law. Any email and/or documents received by or sent from the mailbox [grievance@sucden.com](mailto:grievance@sucden.com) shall be encrypted to avoid any unintended communication to, or any access by, any unauthorized third-party, and shall be kept in an encrypted file whose access is restricted to designated addresses.

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<sup>1</sup> Kindly note that Sucden has a Whistleblowing Policy with a dedicated email address to report irregularities specifically related to corruption.

## Responsibilities & Processing of the Grievance

The persons receiving the Grievance report in person or through the designated email address shall be responsible for:

- Informing the person or group of persons who lodged the Grievance that the report has been received;
- Assessing in the best possible delays whether the reported irregularity and/or misconduct falls within the Grievance mechanism framework and if it is receivable (made in good faith and of a serious nature);
- Informing the person or group of persons whether the report is dismissed or if it is receivable and is therefore going to be subject to further investigations;
- Initiating an internal investigation of the irregularity and/or misconduct, which will be carried out by Sucden personnel having expertise in the reported matter. Sucden may also obtain input from third-party experts depending on the complexity of the matter being investigated;
- Deciding whether the irregularity and/or misconduct is confirmed and, in such case, take any appropriate internal actions in accordance with Sucden's internal rules, or if required, proceed with necessary legal actions before the competent jurisdiction;
- Drafting a comprehensive report of the findings of the internal investigation;
- Informing the person or group of persons who lodged the Grievance of the status of the investigation and Sucden's response throughout the process.

Any and all emails or documents created as part of the Grievance report and subsequent investigation shall be deleted or destroyed following a five (5) year period from the date of its receipt and/or of its use for the purpose of conducting any necessary investigations.

## Implementation & Communication

Implementation of Sucden's Grievance Mechanism Policy shall be carried out by the Chief Compliance Officer. The mechanism shall be shared with all of Sucden's subsidiaries and Stakeholders and be published on Sucden's website, making them aware of how to report any Grievances to Sucden and assisting them in making Stakeholders aware of the process for Grievance reporting.

## Monitoring & Improvement

The effectiveness of the Grievance mechanism shall be monitored continuously and evaluated at least once (1) a year to identify areas for improvement and how they can best be implemented.

## Additional Considerations

Any person or group of persons reporting Grievances shall respect the stepwise approach as well as the privacy and security of those who may be involved, and keep confidential:

- The fact that they have raised a Grievance and shall not communicate either verbally or electronically any information related to the grievance(s) to others either within or outside of Sucden;
- The nature and details of the reported matter as well as the identity of the person or group of persons potentially involved;
- Any feedback and information disclosed to them during the processing and investigation of the Grievance.

Anyone wishing to have additional information regarding this Grievance mechanism should contact the Local Compliance Officer or send their request to the dedicated email address ([grievance@sucden.com](mailto:grievance@sucden.com)).

Any and all data collected within the framework of this mechanism shall be processed and stored in accordance with Sucden's data protection policy.

## Document Version

This Policy has been approved on October 21<sup>st</sup>, 2024, and is made publicly available on Sucden website. It replaces any previous version.