



SUCDEN HUMAN RIGHTS POLICY

INTRODUCTION

All businesses, no matter how large or small, have the responsibility to respect and uphold international Human rights standards. Sucden's business is grounded in its deeply engrained culture of responsibility – which commits our activities to operate in a manner that reflects the responsible care of our employees, clients, suppliers, and partners. In line with this commitment, we act responsibly toward the communities with which we operate and the environments that we share.

Sucden's Human Rights Policy (the "**Policy**") is part of our culture of responsibility, and it is reflective of and inspired by the Universal Declaration of Human Rights (1948), the UN Guiding Principles on Business and Human Rights (2012), as well as other core human rights related international agreements and guidelines, including core child and adult labor conventions of the International Labor Organization, as well as the UN Convention on the Rights of the Child (1989), and the UN Convention on the Elimination of All Forms of Discrimination against Women (1979).

OUR COMMITMENT

While recognizing the obligation of governments to respect, protect, and fulfill the Human rights and fundamental freedoms of their citizens, we, as a privately held company, clearly understand and accept our responsibility to respect and promote Human rights within the entirety of our value chain.

In alignment with the UN Guiding Principles on Business and Human Rights, the core conventions of the International Labor Organization, and our commitment to the UN Global Compact and its Ten Principles, Sucden has implemented a process to inform its employees of their rights and to identify, prevent and mitigate adverse impacts on Human rights in the areas in which we operate. In addition to our general commitment, we specifically commit to the following:

- REGARDING OUR EMPLOYEES. SUCDEN WILL:

- Comply with all applicable standards regarding employment;
- Operate with respect for equal rights and non-discrimination in employment practices and within our work environment;
- Strive to eliminate gender bias in the workplace and implement relevant assessments to compare the remuneration of men and women who bear similar responsibilities;
- Continuously promote the well-being of our employees through high social standards, fair living wages and benefits;
- Invest in the development of our employees;
- Provide a safe, respectful, and healthy work environment.



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- WITHIN OUR SUPPLY CHAINS SUCDEN WILL:

- With a particular focus on cocoa and coffee due to the salience and corresponding large population of producers, our immediate intentions involve:
 - **Forced labour:** our ambition is to prevent and remediate this practice, through country/region-specific risk analysis, due diligence processes, and necessary responses;
 - **Child labour:** comply with laws and regulations on child labour across these value chains, assess risks and monitor and remediate when appropriate, and seek to eradicate the “*worst forms of child labor*” as defined in the Worst Forms of Child Labour Convention, 1999 (International Labour Organization Convention No. 182), with a special emphasis on protecting children from any exposure to pesticides;
 - **Indigenous Peoples:** respect the rights of indigenous peoples to give or withhold their prior consent for any activity that can impact their customary lands, territories, or rights, in accordance with the UN guidelines on Free Prior Informed Consent (FPIC, 2016), the UN Declaration on the Rights of Indigenous Peoples (2007), and Indigenous and Tribal Peoples Convention (International Labour Organisation Convention No.169);
 - **Association:** Work with suppliers to promote employees’ and product providers’ awareness of their right to freedom of peaceful assembly and association; and that no one can be compelled to belong to an association;
 - **Income:** support producers to achieve a living income through a mix of interventions that raise income while maintaining the ability to market their goods;
 - **Sanctions:** continue the rollout of our Code of Conduct and further refine our corrective response to suppliers when Human rights violations are averred/proven.

GOVERNANCE OF THE POLICY

Sucden’s Human Rights Policy is recognized by its business owners and Board of Directors as a fundamental aspect of our responsible approach to business. This Policy was developed with internal input from Sucden’s senior management, employees within their responsibility and compliance functions, as well as from heads of operations and commodity trading activities – all in the context of increasing global expectations of businesses.

Implementation and oversight of the Policy is the responsibility of the Chief Compliance Officer and the Chief Responsibility Officer who report to the Board of Directors. Operational activities related to the Policy take place within Sucden’s core business operational areas: sugar (including agro-industry), cocoa, coffee, grains & oilseeds, rice, and ethanol trading and distribution as well as shipping and brokerage. These activities are the responsibility of the local Sustainability Manager who is most knowledgeable of the specificities of the business. Priority activities are determined in collaboration with local and corporate management on an annual basis.



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POLICY IMPLEMENTATION AND REPORTING

Sucden's Human Rights Policy actively guides activities within its direct operations – i.e., offices and agro-industrial operations – where about 5,000 employees operate. In these offices, Sucden's Human Resource Managers have the responsibility to see that all employees are made aware of their rights, including Sucden's Whistle-Blowing Policy and publicly available Grievance Mechanism, and are provided access to remedy should it be required.

Within its indirect operations, Sucden is committed to assessing, identifying, and addressing the most salient adverse Human rights impacts and focusing efforts in those areas where we have the greatest influence. Initial areas of focus are the cocoa and coffee supply chains of Sucden's largest supplying origins, with a progressive rollout of this Policy and its related activities to all its sourcing operations.

Sucden will regularly track the progress of prioritized activities and report results on an annual basis to the Board of Directors. A synthesis will be included in the annual and publicly released Group Responsibility Report.

Education and training of Sucden's employees as well as informing our suppliers of the expectations related to this Policy and its related codes and guidelines is an ongoing activity, under the direction of the Senior Manager of the local Country Business Unit.

REPORTING BREACHES TO THIS POLICY

Sucden encourages its business partners to disclose any serious irregularities and/or professional misconduct (against Sucden's values, its Code of Conduct, and/or any applicable criminal and/or labour law or regulation affecting Human Rights) that has been personally witnessed. To that end, any relevant matter may be reported in accordance with Sucden's Grievance Mechanism.

RELATED SUCDEN CODES AND POLICIES

Sucden's Human Rights Policy and its implementation forms an integral part of our core business policies and practices, which include:

- **Our Corporate Code of Conduct:** defines the business practices and behaviors that Sucden expects of its employees worldwide. It outlines principles Sucden upholds when conducting business around the world as well as its commitment to comply with all relevant government laws, rules, and regulations. The Code of Conduct also stipulates how we manage Human rights, labor, social equality and welfare, health and safety, environmental protection, anti-corruption, anti-bribery, anti-money laundering as well as economic/trade sanctions.



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- **Our Approach to Responsibility:** Sucden, with its annual Responsibility Report, publicly articulates our commitment to material issues where we have direct (within our sites) and indirect impacts within our supply chains. The approach further highlights five (5) areas where Sucden is committed to taking action. This framework of action includes objectives related to business practices, people, the environment, our supply chains, and communities.
- **Our Specific Supplier Codes of Conduct,** which, for sugar, coffee and cocoa clearly define the expectations of Sucden relative to its suppliers in terms of their demonstrated respect for national and international law, food safety regulations and standards as well as labor practices and working conditions, including the prohibition of child labor and forced labor within their supply chains.
- **Our Forest Protection Policy,** which recognizes the negative impact that deforestation has on habitats and human rights and sets out a detailed action plan to eliminate deforestation within Sucden's cocoa and coffee supply chains.

NEXT STEPS

Sucden's efforts to respect and promote Human rights in our value chain is an ongoing and evolving process. We will update this Policy as we gain additional insights into the salient areas of our operations and supply chains and the most effective manner for them to be addressed.

Document Version

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