

# Supplier Code of Conduct



## PURPOSE AND SCOPE

At Trabocca, 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 standards relating to business integrity, environmental management, labor practices and associate health and safety. The Supplier Code is grounded in the [Acomo Code of Conduct](#), [Environmental Policy](#) and [Human Rights Policy](#) set by our holding company. This Supplier Code also encompasses two additional policies that are part of our [Due Diligence System](#); our Ethical Sourcing Policy and Deforestation-free Sourcing Policy. These two policies are aimed at generating additional assurance in supply chains associated with risk. All partners must be prepared to provide Trabocca with information about subjects mentioned in any of these documents and to be audited on these subjects by Trabocca or an authorized 3<sup>rd</sup> party representative. Suppliers are also expected to conduct due diligence at sub-suppliers up to the field level, and able to share information. 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 Trabocca entities worldwide are expected to follow all four sections of this Code. In case of non-compliance the business relation can be terminated.

## I. BUSINESS INTEGRITY

**1. Maintain awareness and comply with all applicable laws and regulations of the countries of their operations.**

**2. Compete fairly for Trabocca's business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.** Trabocca 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. Trabocca suppliers are prohibited from providing or offering gifts to Trabocca employees that could inappropriately influence Trabocca'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 the suppliers' dealings with Trabocca.

**4. 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 upon request. Trabocca 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.

**5. Deliver products and services meeting applicable quality and food safety standards and regulation.** Trabocca 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 the supplier's 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 Trabocca that could negatively affect the quality or public reputation of a Trabocca product
- Have a maintained and functioning HACCP system.

**6. Not to disclose nonpublic information regarding Trabocca or its operations.** Suppliers must be sensitive to the kinds of information that constitutes Trabocca'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 Trabocca's interests if it were disclosed.

## II. ENVIRONMENT AND BIODIVERSITY

**7. 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. Trabocca encourages 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.

**8. Prevent deforestation and degradation of forest.** Trabocca wants to work with suppliers to prevent and mitigate any deforestation or degradation of forest in our supply chain. Suppliers are expected to have concrete mechanisms in place to be able to identify and mitigate risks of deforestation. Please refer to the [Deforestation-free Sourcing Policy](#) for further details and requirements of suppliers of risk products.

**9. 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.

## III. HUMAN RIGHTS AND WORKPLACE SAFETY

**10. Maintain and promote fundamental human rights.** Employment decisions must be based on free choice and there may be no coerced activities, 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. Please refer to the [Ethical Sourcing Policy](#) for further details and requirements for suppliers in risk countries.

**11. Respect employees' right to freedom of association and collective bargaining, consistent with local laws.** Consistent with applicable law, Trabocca suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations.

**12. Provide safe and healthy working conditions.** Trabocca 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 and sanitation; personal protective equipment; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.

**13. 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.

**14. Treat employees fairly, including with respect to wages, working hours and benefits.** Trabocca suppliers shall comply with all applicable legal and regulatory requirements and will generally apply sound employee relations practices. Work performed must be on the basis of recognized employment relationships established through national law and practice. Only workers with a legal right to work shall be employed. 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.

**15. Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse.** Trabocca 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.

#### **IV. PROCEDURAL AND ADMINISTRATIVE EXPECTATIONS**

**16. Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.**

**17. Support compliance with the Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Trabocca.** Suppliers themselves must enter into contracts with partners and sub-suppliers that are in line with this Supplier Code.

**18. Report (suspicion of) any illegal or otherwise improper conduct,** by a supplier, or an employee of Trabocca, or anyone acting on behalf of Trabocca. Any stakeholder can access the Acomo group's formal grievance mechanism [SPEAK UP!](#), with the option to submit reports anonymously.