



CORPORATE SOCIO AND ENVIRONMENTAL RESPONSIBILITY POLICY

Responsible Palm Oil Sourcing

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In July 2016, Agropalma Group started its new refinery, located in Limeira Town. As processing capacity has increased by 140%, Agropalma became a buyer of crude oils and derivatives. This new scenario brings the challenge to company seeking reliable suppliers, aligned with its values and sustainability policies, as well as aligned with the expectations of its customers and other relevant stakeholders.

Since inauguration of the new refinery, some practices for searching and selection of suppliers began to be tested. Trials continued until November 2017, when company decided to develop and implement this responsible sourcing policy, whose criteria listed below apply to its own operations as well as to all suppliers of oils and derivatives.

Criterion 1 – Business Integrity

Businesses are managed with integrity and ethics, complying with the applicable local and international laws, including free market and competition protection rules. Local anti-corruption laws (where they exist) are attended and practices such as bribes and payment facilitation are prohibited.

Relevant information is provided to stakeholders in accordance with applicable law and recognized corporate transparency practices in the industry, including providing information on compliance with the requirements of this policy to Agropalma Group.

Criterion 2 - Respect for people

Businesses, operations and activities are managed respecting people, through the commitment to the following requirements:

- Respect for human rights, as defined by the United Nations (UN, 1948), and worker rights, as defined by Declaration on Fundamental Principles and Rights at Work and all Core ILO Conventions.
- New plantations in areas used by third parties (smallholders, traditional communities, indigenous peoples, etc.) can only be established after their free, prior and informed consent (FPIC)¹;
- The use of forced labor is prohibited;
- The use of child labor, as defined by the UN, is prohibited;
- Freedom of organization, association and collective bargaining is assured to workers;
- Respect Human Rights Defenders people or organizations when performing their work in a legal and regular manner.
- Pay the minimum at least the wage to all workers.

¹ FPIC will be obtained by following the method of "FREE, PRIOR AND INFORMED CONSENT GUIDE FOR RSPO MEMBERS", (2015). Available on <https://rspo.org/news-and-events/announcements/free-prior-and-informed-consent-guide-for-rspo-members-2015-endorsed>.

**Criterion 3 - Conservation of forests, biodiversity and climate stability**

New oil palm plantations will not be developed in primary forest areas, areas containing any high conservation values (HCV), areas containing high carbon stocks (HCS) or lands with peat soils of any depth. Furthermore, burning shall not be used in land preparation or any other stage of agricultural process, except in cases where it is used to control a specific pest or disease, in accordance with agronomic and best agricultural practices guidebook recommendations, if any.

Criterion 4 - Commitment to Traceability

Implementation and monitoring of the three requirements above are strictly dependent on reliable traceability. Therefore, suppliers commit to disclose the names and geographical coordinates of the extraction mills that produced the palm oil, palm kernel oil and derivatives delivered to the Agropalma refineries. In this way, Agropalma Group aims to achieve 100% traceability to the extraction mills in the year 2020.

Agropalma Group also commits to select its suppliers considering, among others, the following requirements:

- Formal commitment to this policy (mandatory)
- Distance between the supplying mills and Agropalma refineries (Northeast of Para State> State of Para> Brazil> South America> Central America> Africa / Asia)
- RSPO Membership (for while it is a desirable requirement. With the evolution of RSPO in Brazil we hope to make it mandatory)

Agropalma has tested this policy for a period of 11 months since it was launched, in 03/NOV/17, and has made minor updates in its contents on 09/OCT/2018. On 13/Mar/2020 new adjustments and updates were included. Below, the Annex 1 contains information on traceability and origin of the oils and derivatives processed by Agropalma refineries.


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**ANNEX 1 – TRACEABILITY OF OILS PROCESSED BY AGROPALMA GROUP REFINERIES
(Updated in March 2020)**
Traceability of palm oil, palm kernel oil and derivatives processed and/or traded by Agropalma Group refineries in 2019

Variable	Amount (Ton)	% in relation to total	% traceable to the mill	% traceable to FFB plantation
Total oils and derivatives processed and/or traded in the two refineries	170.987	100%	100%	83%
Oils and by-products produced by Agropalma own mills in the two refineries	134.143	78%	100%	100%
Oils and derivatives supplied by other companies for the two refineries	36.844	22%	100%	22%
Amount sourced directly from mills for the two refineries	142.153	83%	100%	100%
Amount sourced from intermediaries (traders and other refineries) in the two refineries	28.834	17%	100%	0%
Traceability at Belem Refinery	-	-	100%	100%
Traceability at Limeira Refinery	-	-	100%	68%

Extraction mills belonging to other companies that supplied palm oil, palm kernel oil and derivatives to Agropalma Group Refineries in 2019

PARENT COMPANY	EXTRACTION MILL	GEOGRAPHICAL COORDINATES
ACEITES Y GRASAS DEL CATATUMBO SAS	ACEITES Y GRASAS DEL CATATUMBO SAS	8°06'35"N; 73°34'28"W
ACEITES CIMARRONES S.A.S ZONA FRANCA	ACEITES CIMARRONES S.A.S ZONA FRANCA	03°02'08.138"N; 073°06'41.276" W
ACEITES MANUELITA SA	ACEITES MANUELITA SA	3°52'59.3"N; 73°20'23.7"W
ACEITES MORICHAL S.A.S	ACEITES MORICHAL S.A.S	3°55'47.46"N; 73°14'33.99"W
ACEITES S.A.	ACEITES S.A.	10°34'12.51"N; 74°12'31.57"O
PT AGRO WIRA LIGATSA	AGRO WIRA LIGATSA	0° 13' 27.62 "N; 99° 42' 56.06 "E
AGROINCE LTDA & CIA SCA	AGROINCE LTDA & CIA SCA	8°6'37.11"N; 73°34'28.66"W
AGROIND. DEL SUR DEL CESAR LTDA Y CIA SCA	AGROINDUSTRIAS DEL SUR DEL CESAR LTDA Y CIA SCA	8°06'34"; 73°34'27
AGROPECUARIA SANTAMARIA S.A.	AGROPECUARIA SANTAMARIA S.A.	3° 30.57" N; 73° 33.30" W
ALIANZA DEL HUMEA S.A.S	ALIANZA DEL HUMEA S.A.S	4°16'19.1"N; 72°58'45.2"W
ALIANZA ORIENTAL S.A.	ALIANZA ORIENTAL S.A.	3°59'42.27" N; 73°34'50.70"W
BAKRIE SUMATERA PLANTATIONS TBK	BAKRIE PASAMAN PLANTATIONS	0° 19' 56.63 "N; 99° 28' 28.13 "E
BELÉM BIOENERGIA BRASIL S.A.	BBB	2°48'20.42"S; 48°55'4.97"W
INCASI RAYA	BINTARA TANI NUSANTARA	0° 19' 56.63 "N; 99° 22' 56.36 "E
BIOPLANTA PARA EL DESARROLLO	BIOPLANTA PARA EL DESARROLLO	7°34'03.55" N; 76°36'44.52" W
BRAGANZA S.A.S	BRAGANZA S.A.S	4°17'03.4"N; 72°07'51.5"W
TRIPUTRA	BRAHMA BINABAKTI	1° 20' 48 "S; 103° 19' 33 "E
SIPEF	BUNGA TANJUNG	2° 43' 1.83 "S; 101° 22' 12.42 "E
PTPN VI	BUNUT	1° 54' 37.7 "S; 103° 24' 9.6 "E
COOPERATIVA PALMAS RISARALDA LTDA	COOPERATIVA PALMAS RISARALDA LTDA	8°20'24.32" N; 72°54'86.63" W
ENTREPALMAS S.A.S.	ENTREPALMAS S.A.S.	3° 33' 52,5"N; 73°34' 459" W
EXTRACTORA CIMARRON S.A.S	EXTRACTORA CIMARRON S.A.S	4°18' 4.27" N; 73° 21' 22.86" W
ACEITES CIMARRONES S.A.S ZONA FRANCA	ACEITES CIMARRONES S.A.S ZONA FRANCA	3°02'08.1"N; 73°06'41.3"W


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PARENT COMPANY	EXTRACTION MILL	GEOGRAPHICAL COORDINATES
EXTRACTORA DEL SUR DE CASANARE S.A.S.	EXTRACTORA DEL SUR DE CASANARE S.A.S.	04° 29' 32.5" N; 72° 50' 25.5" W
EXTRACTORA FRUPALMA S.A.	EXTRACTORA FRUPALMA S.A.	10°42'13.2"N; 74°11'40.1"W
NOT APPLICABLE	EXTRACTORA GRUPALMA	8°39'33.0" N; 73°50'09.0" W
EXTRACTORA LA GLORIA SAS	EXTRACTORA LA GLORIA SAS	8° 36' 57" N; 73° 41' 2" W
EXTRACTORA LOMA FRESCA S.A	EXTRACTORA LOMA FRESCA S.A	7°32'0.096"N; 73°56'59.712" W
EXTRACTORA MARIA LA BAJA S.A	EXTRACTORA MARIA LA BAJA S.A.	7°31'10.4"N; 73°57'21.0"W
EXTRACTORA MONTERREY S.A.	EXTRACTORA MONTERREY S.A.	7° 17.914 ' N; 73° 53.024' W
EXTRACTORA SAN FERNANDO S A	EXTRACTORA SAN FERNANDO S A	9°58'08.5"N; 75°18'19.5"W
EXTRACTORA SICARARE S A S	EXTRACTORA SICARARE S A S	7°11'45.6"N; 73°33'42.6"W
PALMAS DEL CASANARE S.A.S	EXTRACTORA SUR DEL CASANARE S.A.S	4°30'073" N; 72°50'891" W
SINAR JAYA AGRO INVESTAMA	GAJAH SAKTI SAWIT	2°52'6.1248"S; 101°26'10.104"E
GRUPO AGROINDUSTRIAL RIO PAILA CASTILLA	GRUPO AGROINDUSTRIAL RIO PAILA CASTILLA	5°01'51.9"N; 70°50'29.6"W
GUAICARAMO SA	GUAICARAMO SA	4°34'11" N; 72°58'00" W
HACIENDA LA CABAÑA S.A.	HACIENDA LA CABAÑA S.A.	4°18' 4.27" N; 73° 21' 22.86" W
INDUSTRIAL AGRARIA LA PALMA LTDA - INDUPALMA LTDA	INDUSTRIAL AGRARIA LA PALMA LTDA - INDUPALMA LTDA	7°43'56.67"N; 73°27'53.37"W
INVERSIONES EL BORREGO S.A.S	INVERSIONES EL BORREGO S.A.S	7°43'13.9"N; 73°27'29.3"W
INVERSIONES LA MEJORANA LTDA	INVERSIONES LA MEJORANA LTDA	3°56'04.6"N; 73°23'25.7"W
INVERSORA DEL MAGDALENA Y CIA SA	INVERSORA DEL MAGDALENA Y CIA SA	10°43'09.3"N; 74°11'56.5"W
INCASI RAYA	JAMIKA RAYA	1° 26' 40.8 "S; 101° 45' 4.41 "E
SINAR JAYA AGRO INVESTAMA	KARYA AGRO SAWITINDO	2° 42' 34.4 " S; 101° 20' 25.4 "E
SINAR JAYA AGRO INVESTAMA	KARYA SAWITINDO MAS	2°42'40.4"S; 101°20'20.1"E
ANGLO EASTERN PLANTATION	MITRA PUDING MAS	3° 8' 1.62 "S; 101° 36' 5.86 "E
INCASI RAYA	MUARA TIMPEH	0° 59' 49.72 "S; 101° 44' 29.31 "E
SIPEF	MUKO-MUKO	2° 36' 3.56 "S; 101° 16' 42.98 "E
SINAR JAYA AGRO INVESTAMA	MUKO-MUKO INDAH LESTARI	2° 38' 45.28 "S; 101° 17' 23.2 "E
NEGOCIOS DEL LLANO ZOMAC SAS	NEGOCIOS DEL LLANO ZOMAC SAS	4°35'42.05"N; 72°49'38.57"W
NUTRIMEZCLAS Y ACEITES S.A.S	NUTRIMEZCLAS Y ACEITES S.A.S	07°19'13.10"N; 73°35'55.64" W
OLEAGINOSAS DE COLOMBIA LTDA	OLEAGINOSAS DE COLOMBIA LTDA	4°20'40.7"N; 73°10'08.9"W
OLEAGINOSAS DEL NORTE DE SANTANDER S A S	OLEAGINOSAS DEL NORTE DE SANTANDER S A S	8°11'44.0"N; 72°33'16.5"W
OLEAGINOSAS DEL OCOA S.A.	OLEAGINOSAS DEL OCOA S.A.	4°4'46.77"N; 73°41'37.58" W
OLEAGINOSAS SAN MARCOS S.A.	OLEAGINOSAS SAN MARCOS S.A.	3°44'02.7"N; 73°20'32.9"W
OLEAGINOSAS SANTANA S.A.S	OLEAGINOSAS SANTANA S.A.S	3°59'53.1" N; 73°36'48.1" W
OLEOFLORES S.A.	OLEOFLORES S.A.	10°05'50.7"N; 73°14'09.3"W
OLEOINVERSIONES ZOMAC SAS	OLEOINVERSIONES ZOMAC SAS	4°39'17.74"N; 72°4'57.28"W
PTPN VI	OPHIR	0° 0' 52.63 "N; 99° 50' 8.49 "E
PADELMA LTDA. - PALMAS OLEAGINOSAS	PADELMA LTDA. - PALMAS OLEAGINOSAS	10°43'09.3"N; 74°11'56.5"W
PALMA & TRABAJO SAS	PALMA & TRABAJO SAS	3°57'40.0"N; 73°37'34.5"W


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PARENT COMPANY	EXTRACTION MILL	GEOGRAPHICAL COORDINATES
PALMAGRO S.A.	PALMAGRO S.A.	9° 39' 5.21"N; 73° 33' 58.43" W
PALMAR DE ALTAMIRA	PALMAR DE ALTAMIRA	4°45'1.84"N; 71°40'56.86"W
PALMAS DEL CESAR S.A.	PALMAS DEL CESAR S.A.	7°53'9.60"N; 73°28'0.10"W
PALMASA	PALMASA	1° 7'24.68"S; 47°39'24.64"W
PALMERAS DE PUERTO WILCHES S.A.	PALMERAS DE PUERTO WILCHES S.A.	7° 20.3343' N; 73° 50.2749' W
PALMERAS DEL LLANO S.A	PALMERAS DEL LLANO S.A	3°57'39.3"N; 73°37'42.8"W
PALMERAS SANTANA LTDA	PALMERAS SANTANA LTDA	4°33'51.3"N; 72°54'13.5"W
PALMICULTORES DEL NORTE SAS	PALMICULTORES DEL NORTE SAS	8°32'3.83" N; 72°38'7.88" W
INCASI RAYA	PELEPAT	1° 41' 6.56 "S; 102° 14' 7.68 "E
POLIGROW COLOMBIA SAS	POLIGROW COLOMBIA SAS	3°00'46.5" N; 72°12'10.2" W
PROCESADORA DE ACEITE ORO ROJO LTDA	PROCESADORA DE ACEITE ORO ROJO LTDA	07°22'49.42" N; 73°34'31.31" W
PT HERFINTA FARM & PLANTATION	SAPTA SENTOSA JAYA ABADI	2° 23' 7.8 "S; 101° 9' 47.3 "E
ASTRA AGRO LESTARI TBK	SARI ADITYA LOKA 1	1° 39' 5.47 "S; 102° 22' 13.1 "E
ASTRA AGRO LESTARI TBK	SARI ADITYA LOKA 2	0° 13' 45.04 "N; 102° 18' 28.42 "E
SARI BUAH SAWIT	SARI BUAH SAWIT	0° 2' 58.73 "S; 99° 52' 59.31 "E
PT SAWITA PASAMAN JAYA	SAWITA PASAMAN JAYA	0° 19' 16.44 " N; 99° 27' 11.46 " E
INCASI RAYA	SELAGO MAKMUR PLANTATION	1° 15' 2.13 "S; 101° 34' 30.38 "E
PT SENTOSA SEJAHTERA SEJATI	SENTOSA SEJAHTERA SEJATI	2° 39' 59.93 "S; 101° 17' 59.42 "E
PTPN VI	SOLOK SELATAN	1° 23' 34.41 "S; 101° 28' 42.74 "E
ANGLO EASTERN PLANTATION	SUMINDO OIL	1° 57' 33.8" S; 101° 52' 32.34 "E
UNIPALMA S.A	UNIPALMA S.A	4°13'28.46" N; 73°15'17,18" W