	CORPORATE SOCIAL AND ENVIRONMENTAL RESPONSIBILITY POLICY	
	Responsible Palm Oil Sourcing	Review: 07
		Date: 05/mai/2023
		Page: 1/2

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:

- 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, harassment or abuse 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 as well safe and healthy working and living conditions
- 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 and protect worker's right to fair working hours

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-priorand-informed-consent-guide-for-rspo-members-2015-endorsed>.

	CORPORATE SOCIAL AND ENVIRONMENTAL RESPONSIBILITY POLICY	
	Responsible Palm Oil Sourcing	Review: 07
		Date: 05/mar/2023
		Page: 2/2

CRITERION 3 – CONSERVATION OF FOREST, 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 criteria 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 is 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
- Do not produce or source from deforested and peat-converted land after 31 December 2015
- 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. Going through a continuous improvement process, on 20/May/2021 and then, on 03/Jun/2022 new adjustments were included.

Below, the **Annex 1** contains information on traceability and origin of the oils and derivatives processed by Agropalma refineries.

CRITERION 5 - CHANNEL FOR COMPLIANTS AND GRIEVANCES

We rely on stakeholders to help us monitor our supply chain. To do so, we provide a free telephone number *Alô Agropalma* (+55) 0800 7090 706 and also the e-mail aloagropalma@agropalma.com.br. These channels can be accessed by any interested party that wishes to report non-compliance with this policy by any of the suppliers indicated in **Annex 1**.

ANNEX 1 - Responsible Palm Oil Sourcing

Traceability of palm oil, palm kernel and by-products processed and/or marketed by the Agropalma Group refineries in 2022				
Details	Quantity (ton)	% of total	% traceability to extraction industry	% traceability to FFB suppliers
Total oils and derivatives processed and/or sold in the two refineries	218.577	N/A	N/A	N/A
Oils and derivatives produced by Agropalma's own extraction industries used in the two refineries*	206.350	100%	100%	83%
Oils and derivatives supplied by other companies to the two refineries	166.590	81%	100%	100%
Quantity of oils and derivatives purchased directly from extractive industries (own and others) processed in the two refineries	39.760	19%	100%	---
Quantity of oils and derivatives purchased from intermediaries (traders and processors) in the two refineries	172.252	83%	100%	100%
Traceability at Belem refinery	34.098	17%	100%	---
Traceability at Limeira refinery	88.772	43%	100%	93%

*volumes sourced by company-owned mills that come from company-owned operations and third-parties

List of Extraction Industries of the Agropalma Group that supplied crude oils to Belem and Limeira refineries (Q1/Q2 2022)						
Country	Parent company	Mill name	Geographical Coordinates		UML ID	RSPO
			Latitude	Longitude		
BRAZIL	AGROPALMA	AMAPALMA	2°31'28.39"S	48°47'51.23"W	PO1000008811	RSPO Certified, IP
BRAZIL	AGROPALMA	AGROPALMA	2°32'33.82"S	48°42'19.18"W	PO1000000408	RSPO Certified, IP
BRAZIL	AGROPALMA	CPA	2°15'15.08"S	48°35'15.79"W	PO1000000017	RSPO Certified, IP
BRAZIL	AGROPALMA	PARAPALMA	2°32'36.46"S	48°42'22.49"W	PO1000004955	RSPO Certified, IP
BRAZIL	AGROPALMA	CRAI/ AGROPAR	2°31'35.04"S	48°47'49.56"W	PO1000000407	RSPO Certified, IP

**List of Extraction Industries of other companies that supply oils and derivatives to the refineries of Agropalma Group
(Q1/Q2 2022)****

Country	Parent company	Mill name	Geographic Coordinates		UML ID	relationship	RSPO status*
			Latitude	Longitude			
BRAZIL	Agro Industrial Palmasa S.A.	PALMASA	-1.122556	-47.656306	PO1000008222	direct	Not RSPO Certified
COLOMBIA	AGROINCE LTDA Y CIA SCA	AGROINCE LTDA Y CIA SCA	8.110308	-73.574628	PO1000007434	indirect/ trader	RSPO Certified, MB
COLOMBIA	C.I. TEQUENDAMA S.A.S.	EXTRACTORA TEQUENDAMA	10.5485472	-74.181286	PO1000000123	indirect/ trader	RSPO Certified, IP
COLOMBIA	EXTRACTORA LA GLORIA S.A.S.	EXTRACTORA LA GLORIA	8.614083	-73.680028	PO1000004753	indirect/ trader	Not RSPO Certified
COLOMBIA	OLEONORTE	OLEAGINOSAS DEL NORTE DE SANTANDER	8,201426	-72,551283	PO1000013892	indirect/ trader	Not RSPO Certified
COLOMBIA	PALMICULTORES DEL NORTE S.A.S.	PALMICULTORES DEL NORTE (PALNORTE) S.A.S.	8.53507	-72.63589	PO1000007531	indirect/ trader	Not RSPO Certified
COLOMBIA	AGROPECUARIA SANTA MARIA S.A. SAN MARTIN	AGROPECUARIA SANTA MARIA S.A. (SAN MARTIN)	3.515861	-73.558333	PO1000003981	indirect/ trader	RSPO Certified, IP
COLOMBIA	ALIANZA DEL HUMEA S.A.S.	ALIANZA DEL HUMEA S.A.S.	4.269703	-72.981181	PO1000006178	indirect/ trader	Not RSPO Certified
COLOMBIA	ENTREPALMAS S.A.S.	ENTREPALMAS S.A.S.	3.564583	-73.579412	PO1000003983	indirect/ trader	RSPO Certified, IP
COLOMBIA	FEDEPALMA	EXTRACTORA CENTRAL S.A.	7.284	-73.6218	PO1000004010	indirect/ trader	Not RSPO Certified
COLOMBIA	EXTRACTORA DEL SUR DE CASANARE S.A.S.	EXTRACTORA DEL SUR DE CASANARE S.A.S.	4.493442	-72.844307	PO1000003177	indirect/ trader	RSPO Certified, MB
COLOMBIA	EXTRACTORA MONTERREY S.A.	EXTRACTORA MONTERREY S.A.	7.29856	-73.88373	PO1000004012	indirect/ trader	RSPO Certified, MB

COLOMBIA	CI TOP S.A	EXTRACTORA SAN FERNANDO, S.A.	7.25333	-73.566361	PO1000007666	indirect/ trader	Not RSPO Certified
COLOMBIA	EXTRACTORA SICARARE LTDA	EXTRACTORA SICARARE LTDA	9.931944	-73.262494	PO1000004026	indirect/ trader	RSPO Certified, IP
COLOMBIA	EXTRACTORA VIZCAYAS S.A.S.	EXTRACTORA VIZCAYAS S.A.S.	7.575389	-73.950528	PO1000004016	indirect/ trader	Not RSPO Certified
COLOMBIA	GUAICARAMO S.A.	GUAICARAMO S.A.	4.478556	-72.960694	PO1000004751	indirect/ trader	RSPO Certified, MB
COLOMBIA	HACIENDA LA CABAÑA S.A.	HACIENDA LA CABAÑA S.A.	4.301186	-73.35635	PO1000003999	indirect/ trader	RSPO Certified, MB
COLOMBIA	INDUSTRIAL ACEITERA DE CASANARE S.A. SUCURSAL COLOMBIA S.A.	INDUSTRIAL ACEITERA DE CASANARE S.A.	5.087917	-71.959972	PO1000008301	indirect/ trader	Not RSPO Certified
COLOMBIA	OLEAGINOSAS DEL OCOA	OLEAGINOSAS DEL OCOA	4.079083	-73.693639	PO1000008259	indirect/ trader	Not RSPO Certified
COLOMBIA	OLEAGINOSAS SAN MARCOS LTDA	OLEAGINOSAS SAN MARCOS LTDA	3.733154	-73.341972	PO1000007667	indirect/ trader	Not RSPO Certified
COLOMBIA	GRUPO OLEOFLORES	OLEOFLORES	10.097972	-73.235556	PO1000003324	indirect/ trader	RSPO Certified, MB
COLOMBIA	PALMAS OLEAGINOSAS DEL MAGDALENA LTDA (PALDEMA)	PALMAS OLEAGINOSAS DEL MAGDALENA LTDA (PALDEMA, PADELMA)	10.722222	-74.2	PO1000004032	indirect/ trader	Not RSPO Certified
COLOMBIA	PALMAR DE ALTAMIRA S.A.S.	PALMAR DE ALTAMIRA S.A.S.	4.750511	-71.682461	PO1000004007	indirect/ trader	RSPO Certified, IP
COLOMBIA	PALMAS DEL CESAR S.A.	PALMAS DEL CESAR	7.886	-73.466694	PO1000004752	indirect/ trader	RSPO Certified, IP
COLOMBIA	PALMERAS DE LA COSTA S.A.	PALMERAS DE LA COSTA	10.101325	-74.0101	PO1000003031	indirect/ trader	RSPO Certified, IP
COLOMBIA	PALMERAS DE PUERTO WILCHES S.A.	PALMERAS DE PUERTO WILCHES S.A.	7.339056	-73.837389	PO1000004014	indirect/ trader	Not RSPO Certified

COLOMBIA	PALMERAS SANTANA LTDA	PALMERAS SANTANA LTDA	4.564131	-72.907618	PO1000004003	indirect/ trader	RSPO Certified, MB
COLOMBIA	SAPUGA S.A.	SAPUGA S.A.	4.147981	-72.037175	PO1000003996	indirect/ trader	Not RSPO Certified
COLOMBIA	ACEITES MANUELITA	ACEITES MANUELITA S.A. (YAGUARITO)	3.882933	-73.341206	PO1000005117	indirect/ trader	RSPO Certified, MB
COLOMBIA	EXTRACTORA MARIA LA BAJA S.A.	EXTRACTORA MARIA LA BAJA S.A.	9.9235	-75.327607	PO1000007502	indirect/ trader	Not RSPO Certified
COLOMBIA	EL ROBLE S.A	EXTRACTORA EL ROBLE S.A.	10.671	-74.215165	PO1000004030	indirect/ trader	RSPO Certified, IP, MB
COLOMBIA	PALMAGRO S.A.	PALMAGRO	9.6514	-73.56629	PO1000004025	indirect/ trader	Not RSPO Certified
INDONESIA	ASIA SAWIT MAKMUR JAYA	ASIA SAWIT MAKMUR	-0.485489	101.452011	PO1000004315	indirect/ trader	Not RSPO Certified
INDONESIA	BERKAT SAWIT SEJAHTERA	BERKAT SAWIT SEJAHTERA	-0.71	102.66	PO1000007652	indirect/ trader	Not RSPO Certified
INDONESIA	BERKAT SAWIT SEJAHTERA	BERKAT SAWIT SEJAHTERA (PASAMAN)	0.238164	99.705263	PO1000004366	indirect/ trader	Not RSPO Certified
INDONESIA	BINA MITRA MAKMUR	BINA MITRA MAKMUR	-1.49723	102.240672	PO1000007481	indirect/ trader	Not RSPO Certified
INDONESIA	BUKIT SAWIT SEMESTA	BUKIT SAWIT SEMESTA	-0.344148	99.961593	PO1000008636	indirect/ trader	Not RSPO Certified
INDONESIA	BUMI MENTARI KARYA	BUMI MENTARI KARYA	-2.87559	101.423755	PO1000004078	indirect/ trader	Not RSPO Certified
INDONESIA	TEGUH KARSA WANALESTARI	BUNGA RAYA	0.92772	102.02125	PO1000006144	indirect/ trader	Not RSPO Certified
INDONESIA	FORTIUS AGRO ASIA	FORTIUS AGRO ASIA	0.477181	100.7515306	PO1000004190	indirect/ trader	Not RSPO Certified

INDONESIA	GEMILANG SAWIT LESTARI	GEMILANG SAWIT LESTARI	-0.45481	101.827	PO1000007508	indirect/ trader	Not RSPO Certified
INDONESIA	GUNUNG SAWIT ABADI	KINALI	-0.046138	99.915697	PO1000008131	indirect/ trader	Not RSPO Certified
INDONESIA	HASIL KARYA BUMI SEJATI	HASIL KARYA BUMI SEJATI	1.45105	100.6165306	PO1000004260	indirect/ trader	Not RSPO Certified
INDONESIA	KARYA INDORATA PERSADA	KARYA INDORATA PERSADA	0.113361	101.2356	PO1000007546	indirect/ trader	Not RSPO Certified
INDONESIA	KEMILAU PERMATA SAWIT	SIJUNJUNG	-0.903778	101.3981389	PO1000006186	indirect/ trader	Not RSPO Certified
INDONESIA	MITRA UNGGUL PUSAKA	SEGATI	0.141389	101.6466667	PO1000004157	indirect/ trader	Not RSPO Certified
INDONESIA	SRI INDRAPURA SAWIT LESTARI	SRI INDRAPURA SAWIT LESTARI	0.46424	101.7365	PO1000008425	indirect/ trader	Not RSPO Certified
INDONESIA	USAHA SAWIT MANDIRI	USAHA SAWIT MANDIRI	0.30609	99.4476	PO1000006161	indirect/ trader	Not RSPO Certified
INDONESIA	BORNEO INDAH MARJAYA	BORNEO INDAH MARJAYA	-2.033198	116.401023	PO1000004096	indirect/ trader	Not RSPO Certified
INDONESIA	BUKIT JEJER SUKSES	BUKIT JEJER SUKSES	-2,2923	121,79167	PO1000012851	indirect/ trader	Not RSPO Certified
INDONESIA	KUTAI BALIAN NAULI	KUTAI BALIAN NAULI	0.75	117.35	PO1000007638	indirect/ trader	Not RSPO Certified
INDONESIA	DHARMA SATYA NUSANTARA	DHARMA SATYA NUSANTARA MILL 8 (AGRO ANDALAN)	-0,102824	111,029149	PO1000010802	indirect/ trader	Not RSPO Certified
INDONESIA	DWIE WARNA KARYA	DWIE WARNA KARYA	-0.84194	114.08	PO1000007648	indirect/ trader	Not RSPO Certified
INDONESIA	KALIMANTAN AGRO NUSANTARA	KALINUSA RANTAU PULUNG	0,676288	117,227312	PO1000011591	indirect/ trader	Not RSPO Certified

INDONESIA	KEMILAU INDAH NUSANTARA	SUNGAI BENGALON	0.72294	117.65753	PO1000008264	indirect/ trader	Not RSPO Certified
INDONESIA	BUKIT PALEM	BUKIT PALEM	-2.373333	110.643333	PO1000008176	indirect/ trader	Not RSPO Certified
INDONESIA	UNKNOWN	PALMA AGROINDO MANDIRI	-2,38248	111,30788	PO1000010796	indirect/ trader	Not RSPO Certified
INDONESIA	PALMA BUMI LESTARI	PALMA BUMI LESTARI	0,4769	110,0628	PO1000012849	indirect/ trader	Not RSPO Certified
INDONESIA	PERKEBUNAN NUSANTARA XIII	LONG PINANG	-1.92927	116.12431	PO1000008578	indirect/ trader	Not RSPO Certified
INDONESIA	PERMATA NUSA SEJATI	PERMATA NUSA SEJATI	4.173797	117.444342	PO1000010069	indirect/ trader	Not RSPO Certified
INDONESIA	PERMATA SUBUR LESTARI	PERMATA SUBUR LESTARI	0.027861	111.433417	PO1000008608	indirect/ trader	Not RSPO Certified
INDONESIA	SUMBER ADINUSA LESTARI	SUMBER ADINUSA LESTARI	-2.20405	111.47948	PO1000008182	indirect/ trader	Not RSPO Certified
INDONESIA	TAYAN BUKIT SAWIT	TAYAN BUKIT SAWIT	0.543489	110.423819	PO1000008230	indirect/ trader	Not RSPO Certified
INDONESIA	TOSCANO INDAH PRATAMA	TOSCANO INDAH PRATAMA	-1.086785	119.472903	PO1000008569	indirect/ trader	Not RSPO Certified
INDONESIA	ETAM BERSAMA LESTARI	ETAM BERSAMA LESTARI	1.223889	117.8794	PO1000008346	indirect/ trader	Not RSPO Certified
INDONESIA	SURYA SAWIT SEJATI	LADA	-2.590899	111.772559	PO1000004083	indirect/ trader	RSPO Certified, MB

**based on the UML list information, consulted in Dez.2022 ([https://www.rainforest-alliance.org/business/certification/the-universal-mill-list/#:~:text=The%20Universal%20Mill%20List%20\(UML,more%20than%20%2C000%20mills%20worldwide.\)](https://www.rainforest-alliance.org/business/certification/the-universal-mill-list/#:~:text=The%20Universal%20Mill%20List%20(UML,more%20than%20%2C000%20mills%20worldwide.)))