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

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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

<table>
<thead>
<tr>
<th>Details</th>
<th>Quantity (ton)</th>
<th>% of total</th>
<th>% traceability to extraction industry</th>
<th>% traceability to FFB suppliers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total oils and derivatives processed and/or sold in the two refineries</td>
<td>218.577</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>Oils and derivatives produced by Agropalma’s own extraction industries used in the two refineries*</td>
<td>206.350</td>
<td>100%</td>
<td>100%</td>
<td>83%</td>
</tr>
<tr>
<td>Oils and derivatives supplied by other companies to the two refineries</td>
<td>166.590</td>
<td>81%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Quantity of oils and derivatives purchased directly from extractive industries (own and others) processed in the two refineries</td>
<td>39.760</td>
<td>19%</td>
<td>100%</td>
<td>---</td>
</tr>
<tr>
<td>Quantity of oils and derivatives purchased from intermediaries (traders and processors) in the two refineries</td>
<td>172.252</td>
<td>83%</td>
<td>100%</td>
<td>100%</td>
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<tr>
<td>Traceability at Belem refinery</td>
<td>34.098</td>
<td>17%</td>
<td>100%</td>
<td>---</td>
</tr>
<tr>
<td>Traceability at Limeira refinery</td>
<td>88.772</td>
<td>43%</td>
<td>100%</td>
<td>93%</td>
</tr>
</tbody>
</table>

*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)

<table>
<thead>
<tr>
<th>Country</th>
<th>Parent company</th>
<th>Mill name</th>
<th>Geographical Coordinates</th>
<th>UML ID</th>
<th>RSPO</th>
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<tr>
<td>BRAZIL</td>
<td>AGROPALMA</td>
<td>AMAPALMA</td>
<td>2°31’28.39”S 48°47’51.23”W</td>
<td>PO1000008811</td>
<td>RSPO Certified, IP</td>
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<tr>
<td>BRAZIL</td>
<td>AGROPALMA</td>
<td>AGROPALMA</td>
<td>2°32’33.82”S 48°42’19.18”W</td>
<td>PO1000000408</td>
<td>RSPO Certified, IP</td>
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<tr>
<td>BRAZIL</td>
<td>AGROPALMA</td>
<td>CPA</td>
<td>2°15’15.08”S 48°35’15.79”W</td>
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<td>RSPO Certified, IP</td>
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<tr>
<td>BRAZIL</td>
<td>AGROPALMA</td>
<td>PARAPALMA</td>
<td>2°32’36.46”S 48°42’22.49”W</td>
<td>PO1000004955</td>
<td>RSPO Certified, IP</td>
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<tr>
<td>BRAZIL</td>
<td>AGROPALMA</td>
<td>CRAI/ AGROPAR</td>
<td>2°31’35.04”S 48°47’49.56”W</td>
<td>PO100000407</td>
<td>RSPO Certified, IP</td>
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</tbody>
</table>
List of Extraction Industries of other companies that supply oils and derivatives to the refineries of Agropalma Group (Q1/Q2 2022)**

<table>
<thead>
<tr>
<th>Country</th>
<th>Parent company</th>
<th>Mill name</th>
<th>Geographic Coordinates</th>
<th>UML ID</th>
<th>relationship</th>
<th>RSPO status*</th>
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<td>BRAZIL</td>
<td>Agro Industrial Palmasa S.A.</td>
<td>PALMASA</td>
<td>-1.122556</td>
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<td>Not RSPO Certified</td>
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<tr>
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<td>AGROINCE LTDA Y CIA SCA</td>
<td>AGROINCE LTDA Y CIA SCA</td>
<td>8.110308</td>
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<td>indirect/trader</td>
<td>RSPO Certified, MB</td>
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<tr>
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<td>C.I. TEQUENDAMA S.A.S.</td>
<td>EXTRACTORA TEQUENDAMA</td>
<td>10.5485472</td>
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<tr>
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<td>EXTRACTORA LA GLORIA</td>
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<td>indirect/trader</td>
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<tr>
<td>COLOMBIA</td>
<td>OLEONORTE</td>
<td>OLEAGINOSAS DEL NORTE DE SANTANDER</td>
<td>8.201426</td>
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<td>indirect/trader</td>
<td>Not RSPO Certified</td>
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<tr>
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