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HISTORY OF CHANGES

DATE	REVIEW	REVISED ITEMS	ELABORATION	APPROBATION
01/09/2005	00	Initial issue	Raimundo Alves	Gilberto Cabral
14/11/2008	01	Alteration of items 2, 3 and 4.	Raimundo Alves	Gilberto Cabral
07/07/2016	02	General review	Tulio Dias	Marcello Brito
01/07/2020	03	General review	Wander Antunes	Tulio Dias
18/07/2023	04	Typography, general review, alteration of items 5.2, 5.3, 5.5 and 6	Paloma Silva / Wander Antunes	Tulio Dias

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1. OBJECTIVE

This policy aims to guide the business conduct of the Agropalma Group, in order to meet the requirements of the main stakeholders and the public commitments related to the social and environmental performance assumed by the company.

2. REFERENCE DOCUMENTS


- Agropalma Group Conduct and Ethics Manual
- Roundtable on Sustainable Palm Oil (RSPO) - Principles & Criteria (P&C 2018)
- Roundtable on Sustainable Palm Oil (RSPO) - Supply Chain Certification Standards (SCC 2020)
- Integrated Management System Manual and Policy (SIG)
- ILO Declaration on Fundamental Principles and Rights at Work (ILO 1998)
- Universal Declaration of Human Rights (UN, 1948)

3. DEFINITIONS AND ACRONYMS

HCV	- High Conservation Values
HCS	- High Carbon Stocks
FFB	- Fresh Fruit Bunch (of palm)
ILO	- International Labor Organization
UN	- United Nations
HRD	- Human Rights Defenders
NDPE	- No Deforestation, no Peat, no Exploitation
FPIC	- Free, Prior and Informed Consent

4. RESPONSIBILITY

Activity	Responsibility
Control this policy	Sustainability Director
Control the application of this procedure	President, Directors and Managers

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5. DETAIL

5.1. INTEGRITY AND ETHICS IN BUSINESS CONDUCT

The Agropalma Group, and consequently all its employees, must conduct its business with integrity, ethics and fairness, complying with all applicable local and international laws, including the rules on free market and protection of competition and as established in the Conduct and Ethics Manual of the Agropalma Group (items 1, 2 and 3). In addition, Company is committed to managing its business and operations considering and fully respecting the Brazilian Anti-Corruption Law (Law No. 12846/2013). Practices such as kickbacks, bribes, payments facilitation, fraudulent use of funds and resources are strictly prohibited.

Company employees are forbidden from giving or receiving gifts which value exceeds USD 30.00. Contributions to political parties or campaigns are prohibited under current legislation. Donations for charity or sponsorship purposes should be avoided and, when made, must be approved by the directors.

Agropalma is committed to publishing all information determined by Brazilian legislation, as well as sustainability reports (GRI model) every two years.

5.2. RESPECT FOR HUMAN RIGHTS, WORKERS AND COMMUNITIES AFFECTED BY BUSINESS


The Agropalma Group develops its activities respecting the Universal Declaration of Human Rights (UN, 1948) and the ILO Declaration on Fundamental Principles and Rights at Work (ILO 1998). Below are the main criteria, which must also be met by raw material suppliers.

5.2.1. CHILD LABOR

The involvement, support and/or use of the work of children under 16 (sixteen) years of age and the exposure of young workers (any worker over the age of 16 and under 18 years old) to dangerous, unsafe or unhealthy situations inside or outside the workplaces is prohibited. The Agropalma Group will adopt administrative sanctions and suspend suppliers that use child labor until the situation is remediated.

5.2.2. FORCED, TRAFFICED OR DEGRADING LABOR

Workers must be protected from harassment or abuse. The involvement or support to forced, trafficked or degrading labor is prohibited, as well as the practices of retaining documents or requiring deposits at the start of work (recruitment fee), contract replacement, involuntary overtime (working hours must be recorded and not longer than permitted by law, ensuring paid weekly rest whenever applicable), lack of freedom for workers to resign, penalty for the worker on termination of employment, debt bondage and withholding wages. The Agropalma Group will adopt administrative sanctions and suspend suppliers that use forced, trafficked or degrading labor until the situation is remediated.

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5.2.3. HEALTH AND SAFE

Adequate working conditions are guaranteed to all employees, based on the highest principles of hygiene, health and safety and in compliance with legislation and good market practices, including a commitment to promoting adequate housing conditions, when applicable.

5.2.4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The Agropalma Group recognizes and guarantees the right of all workers to freedom of association with unions, associations and other entities representing their working class. In addition, the Agropalma Group guarantees free access of representatives of these entities to the workplace, as well as recognize the workers' right to collective bargaining.

5.2.5. EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

Discrimination based on ethnic origin, caste, race, social class, nationality, religion, disability, gender, sexual orientation, union membership or political affiliation, age or any other social condition is prohibited. Agropalma assures diversity, inclusion and equal opportunities for workers and other people with whom the company has relationship. The selection, hiring and promotion processes for employees are based on the skills, abilities, qualities and health conditions required for the jobs available.

5.2.6. REMUNERATION


It is compatible with the market, with legislation, with current collective bargaining agreements, respecting and protecting worker's right to fair working hours and with living wage guidelines, allowing basic needs satisfaction and improvement of the life quality of employees.

5.2.7. HUMAN RIGHTS DEFENDERS

Any action to inhibit legal and regular activities of people or organizations classified as Human Rights Defending (URD) or acting to restrict freedom of expression, freedom of association or the right to peaceful manifestation of these people and organizations is prohibited.

5.2.8. RIGHT TO USE THE LAND

The Agropalma Group occupies land for its operations, whether agricultural or industrial, after a rigorous analysis of the legitimacy of this use. The company recognizes and respects the right of traditional communities and indigenous peoples to their lands and does not occupy these areas. The farms, as well as the refineries' lands, were purchased from private owners, at market price and in accordance with Brazilian legislation.

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5.2.9. PALM PLANTING IN PARTNERSHIP SYSTEM

New plantings in partnership with family farmers and other FFB suppliers will be established only after their free, prior and informed consent (FPIC), respecting the No Deforestation, No Peat, No Exploitation (NDPE) guidelines and after meeting the requirements established in this policy.

5.3. COMBATING DEFORESTATION AND CLIMATE CHANGE

The new palm plantations are established respecting the no-deforestation principle and the protection of biodiversity according to the following requirements, which are applied to own new plantings as well as to plantations made by family farmers and integrated outgrowers in partnership with Agropalma:


- Since Nov/2005, the area intended for the new planting is not or was covered by native vegetation, even secondary forests;
- Carry out social and environmental impact assessments, including assessment of High Conservation Value (HCV) and High Carbon Stock (HCS), before the new planting is established.
- The area intended for the new planting does not fit into any type of HCV or HCS.
- The area intended for the new planting does not have peat soil or any other types of soil considered unsuitable for palm cultivation;
- Fire will not be used in preparing the area used for planting.

5.4. WATER, ENERGY, CARBON AND LAND

The Agropalma Group is committed to adopt practices, processes and technologies that reduce water and energy consumption, minimize carbon emissions and optimize land use. Therefore, the company seeks to invest in technologies such as water reuse, use of fuel with lower carbon emissions, adequate treatment of effluents, energy efficiency and productivity of its processes. In this way, we seek to reduce our water, energy, carbon and land use footprints.

5.5. ENGAGEMENT WITH INTERESTED PARTIES AND FAMILY FARMERS SUPPORT

The Agropalma Group practices engagement with its stakeholders (customers, surrounding communities, ONGs, universities, students, suppliers, public authorities, among others), with whom it exchanges information and expectations, as well as develops initiatives, including the family farmers inclusion and support, to improve the sustainability level of its internal processes, contribute to the sustainable development of the palm oil and agribusiness sector as a whole.

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6. DEVIATION TREATMENT

Deviations in conduct related to the guidelines established by this policy must be reported to the Company's Top Management, who must take appropriate administrative, commercial and legal measures.

In order to report any irregular situation, human rights defenders, internal whistleblowers, complainants, community representatives and other interested parties can use several communication channels made available by the company, including the email: aloagropalma@agropalma.com.br. Confidentiality of identity is assured if the complainant so wishes. The report can also be registered anonymously, through "Alô Agropalma" line: 0800 7090 706.